

Cover Page



Universiteit Leiden



The handle <http://hdl.handle.net/1887/29963> holds various files of this Leiden University dissertation.

Author: Bal, Aleksandra Marta

Title: Taxtation of virtual currency

Issue Date: 2014-12-02

Bibliography

- Abdallah, W.M. & A. Murtuza, *Transfer Pricing Strategies of Intangible Assets, E-commerce and International Taxation of Multinationals*, 32 *International Tax Journal* 2 (2006)
- Abreu, A.G. & R.K. Greenstein, *Defining Income*, 11 *Florida Tax Review* 295 (2011)
- Adams, T.S., *Fundamental Problems of Federal Income Taxation*, 35 *Quarterly Journal of Economics* 553 (1921)
- Adams, E. & A. Rollings, *Fundamentals of Game Design* (Pearson Prentice Hall 2007)
- Ainsworth, R.T., *Technology Can Solve MTIC Fraud – VLN, RTvat, D-VAT certification*, 22 *Intl. VAT Mon.* 3 (2011)
- Ainsworth, R.T., *Technology Can Solve MTIC Fraud – 3 and Final*, 22 *Intl. VAT Mon.* 4 (2011)
- Alm, J. & M.I. Melnik, *Do eBay Sellers Comply with State Sales Taxes?* 63 *National Tax Journal* 2 (2010)
- Ault, H.J. & B.J. Arnold, *Comparative Income Taxation: A Structural Analysis* (Kluwer Law International 2010)
- Australian Taxation Office (ATO), *Tax treatment of crypto-currencies in Australia – specifically bitcoin* (20 Aug. 2014), available at: <https://www.ato.gov.au/General/Gen/Tax-treatment-of-crypto-currencies-in-Australia---specifically-bitcoin/>
- Avi-Yonah, R.S., *International Taxation of Electronic Commerce*, 52 *Tax L. Rev.* 507 (1996/1997)
- Azam, R., *Global Taxation of Cross-border Electronic Commerce*, 31 *Virginia Tax Review* 639 (2012)
- Azam, R., *The Political Feasibility of a Global E-Commerce Tax*, 43 *University of Memphis Law Review* 711 (2013)
- Bal, A., *Recent EU VAT Changes – The Invoicing Directive*, 52 *Eur. Taxn.* 9 (2012)
- Bal, A., *Tax Implications of Cloud Computing – How Real Taxes Fit into Virtual Clouds*, 66 *Bull. Intl. Taxn.* 6 (2012)
- Bal, A., *EU VAT: New Rules on B2C Supplies of Digital Services from 2015*, 54 *Eur. Taxn.* 7 (2014)
- Bal, A., *The Sky's the Limit*, 68 *Bull. Intl. Taxn.* 9 (2014)
- Barber, S., X. Boyen, E. Shi & E. Uzun, *Bitter to Better – How to Make Bitcoin a Better Currency in Financial Cryptography and Data Security* pp. 399-414 (Springer 2012)
- Barkai, D., *An Introduction to Peer-to-Peer Computing*, *Intel Developer Update Magazine* (Feb. 2000).
- Basu, S., *Global Perspectives on E-commerce Taxation Law* (Aldershot Ashgate 2007)
- Baumach, A. et al., *Handelsgesetzbuch* (C.H. Beck Verlag 2010)
- Berberich, M., *Virtuelles Eigentum* (Mohr Siebeck 2010)

- Bergstra, J.A., *Formaleuros, Formalbitcoins, and Virtual Monies* (2013), available at: <http://arxiv.org/abs/1008.0616>
- Bergstra, J.A. & K. de Leeuw, *Bitcoin and Beyond: Exclusively Informational Money* (2013), available at: <http://arxiv.org/abs/1304.4758>
- Birch, D., *Virtual Money: Money Laundering in Virtual Worlds: Risks and Reality*, 9 *E-Finance & Payments Law and Policy* 5 (2007)
- Bloomfield, R.J., *Worlds for Study: Invitation – Virtual Worlds for Studying Real-World Business (and Law, and Politics, and Sociology, and....)* (May 2007), available at: <http://ssrn.com/abstract=988984>
- Blümich: *Einkommensteuergesetz. Loseblatt-Kommentar* (C.H. Beck Verlag 2009)
- Bowman, C. & V. Ambrosini, *Value Creation versus Value Capture: Towards a Coherent Definition of Value in Strategy*, 11 *British Journal of Management*, pp. 1-15 (2000)
- Bradley, C. & A.M. Froomkin, *Virtual Worlds, Real Rules*, 49 *New York Law School Law Review* 121 (2008)
- Braun, N., *Objektivierung der Gewinnerzielungsabsicht bei der Liebhaberei*, 55 *Betriebsberater* 6, (2000)
- Bray, D.A. & B.R. Konsynski, *Virtual worlds, Virtual economies, Virtual institutions* (2006), available at: http://papers.ssrn.com/sol3/papers.cfm?abstract_id=962501
- Brederode, R.F. van, *Systems of General Sales Taxation* (Wolters Kluwer 2009)
- Brederode, R.F. van, *Introduction to the US State Sales and Use Taxes*, 18 *Intl. VAT Mon.* 4 (2007)
- Brederode, R.F. van, *The Harmonization of Sales and Use Taxes in the United States*, 18 *Intl. VAT Mon.* 6 (2007)
- Brown, C. & J. Mintz, *On the Relationship between International Tax Neutrality and Non-Discrimination Clauses under Tax Treaties for Source-Based Taxes in Tax Treaties: Building Bridges between Law and Economics* (M. Lang et al. eds. IBFD 2010)
- Büchner, T., *Die rechtlichen Grundlagen der Übertragung virtueller Güter* (Nomos Verlagsgesellschaft 2011)
- Bundesanstalt für Finanzdienstleistungsaufsicht, *Bitcoins: Aufsichtliche Bewertung und Risiken für Nutzer* (19 Dec. 2013), available at: http://www.bafin.de/SharedDocs/Veroeffentlichungen/DE/Fachartikel/2014/fa_bj_1401_bitcoins.html
- Cabasso, A., *Piercing Pennoyer with the Sword of a Thousand Truths: Jurisdictional Issues in the Virtual World*, 22 *Fordham Intellectual Property Media & Entertainment Legal Journal* 383 (2011)
- Camp, B., *The Play's the Thing: A Theory of Taxing Virtual Worlds*, 59 *Hastings Law Journal* 1 (2007)
- Caron, P.L., *Pepperdine Hosts Symposium on the Most Maligned Supreme Court Decisions*, *Tax Prof. L. Blog* (1 Apr. 2011), available at: <http://taxprof.typepad.com/taxprofblog/2011/04/supreme-mistakes.html>
- Castronova, E., *Virtual Worlds: A First-Hand Account of Market and Society on the Cyberian Frontier*, CESifo Working Paper Series No. 618 (2001), available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=294828
- Castronova, E., *On Virtual Economies*, CESifo Working Paper No. 752 (July 2002), available at: http://papers.ssrn.com/sol3/papers.cfm?abstract_id=338500
- Cavanaugh, T., *Iowa Can Do Better than the Affiliate Tax: A Proposal for an Intermediary Tax*, 97 *Iowa L. Rev.* 567 (2012)

- CCH Editorial Staff, *US Master Tax Guide 2013* (CCH 2013)
- CCH Editors, *British Master Guide* (CCH 2012)
- Chaum, D., *Blind signatures for untraceable payments* (1983), available at: www.hit.bme.hu/~buttyan/courses/BMEVIHIM219/2009/Chaum.BlindSigForPayment.1982.PDF
- Cheng, E., *Structural Laws and the Puzzle of Regulating Behaviour*, 100 *Northwestern University Law Review* 655 (2006)
- Chilton, F.R., *Income Effectively Connected with a United States Trade or Business or Attributable to a Permanent Establishment*, 5 *Hastings Intl. & Comp. L. Rev.* 497 (1981-1982).
- Chodorow, A., *Ability to Pay and The Taxation of Virtual Income*, 75 *Tennessee Law Review* 695 (2008)
- Chodorow, A., *Tracing Basis through Virtual Spaces*, 95 *Cornell Law Review* 290 (2010)
- Choudhary, V., *Electronic Commerce and Principle of Permanent Establishment under the International Taxation Law*, 37 *International Tax Journal* 4 (2011)
- Christin, N., *Travelling the Silk Road: A Measurement Analysis of a Large Anonymous Online Marketplace* (30 Nov. 2012), available at: <http://arxiv.org/abs/1207.7139>
- Chung, S., *Real Taxation of Virtual Commerce*, 28 *Virginia Tax Review* 3 (2008)
- Clark, J.M., *The concept of value*, *The Quarterly Journal of Economics*, pp. 663-673 (1915)
- Cockfield, A.J., *The Law and Economics of Digital Taxation: Challenges to Traditional Tax Laws and Principles*, 56 *Bull. Intl. Fisc. Doc.* 12 (2002)
- Corput, W. van der & F. Annacondia, *EU VAT Compass 2012/2013* (IBFD 2013)
- Corput, W. van der & F. Annacondia, *VAT Registration Thresholds in Europe*, 24 *Intl. VAT Mon.* 6 (2013)
- Cowan, D., *New York's Unconstitutional Tax on the Internet: Amazon.com v. New York State Department of Taxation and Finance and the Dormant Commerce Clause*, 88 *N.C. L. Rev.* 1423 (2010)
- Cryptocurrency Legal Advocacy Group Inc., *Staying Between the Lines: A Survey of U.S. Income Taxation and its Ramifications on Cryptocurrencies* (15 Apr. 2012)
- Danish Tax Administration (SKAT), *Bitcoins, ikke erhvervsmæssig begrundet, anset for særskilt virksomhed* (25 Mar. 2014), available at: www.skat.dk/skat.aspx?old=2156173&vId=0
- Davis, W.R., *Bitcoin Is Property, Not Currency, IRS Says*, *Worldwide Tax Daily, Tax Analysts* (26 Mar. 2014)
- De la Feria, R. & R. Krever, *Ending VAT Exemptions: Towards a Post-Modern VAT*, in: *VAT Exemptions* (R. de la Feria ed., Wolters Kluwer 2013).
- Dibbell, J., *Play Money: Or How I Quit My Day Job and Made Millions Trading Virtual Loot* (Basic Books 2007)
- Dijk, J.E.A.M. van, *Vermogensbeheer*, *WFR* 1976/5258
- Doernberg, R.L. et al., *Electronic Commerce and Multijurisdictional Taxation* (Kluwer Law International 2001)
- Dougherty, C., *Bragg v. Linden: Virtual Property Rights Litigation*, 9 *E-Commerce Law & Policy* 7 (2007)
- Dutch Tax Authorities (Belastingdienst), *Inkomstenbelasting. Belastbaar resultaat uit overige werkzaamheden*, *BLKB* 2014/286M

- Dworkin, R., *Taking rights seriously* (Harvard University Press 1978)
- Eckert, P., *Steuerliche Betrachtung elektronischer Zahlungsmittel am Beispiel sog. Bitcoin-Geschäfte*, *Der Betrieb* 38 (2013)
- Elkins, D., *The Myth of Realization: Market-to-Market Taxation of Publicly-Traded Securities*, 10 *Florida Tax Review* 5 (2010)
- Ely, R.T., *Outlines of Economics* (Macmillan 1909).
- Endriss, H. et al., *Steuerkompendium, Band 1: Ertragsteuern* (NWB 2007)
- Epstein, R.A., *Taxation in a Lockean World*, 4 *Social Philosophy and Policy* 1 (1986)
- Estonian Tax and Customs Board (*Maksu- ja Tolliamet*), *Maksustamine Bitcoin'idega kauplemisel* (Mar. 2014), available at: <http://www.emta.ee/index.php?id=35227&highlight=bitcoin>
- European Central Bank, *Issues Arising from the Emergence of Electronic Money*, ECB Monthly Bulletin (Nov. 2000)
- European Central Bank, *Virtual Currency Schemes* (Oct. 2012)
- European Commission, *Communication on Electronic Commerce and Indirect Taxation*, COM(1998)374 final (17 June 1998)
- European Commission, *Communication from the Commission to the European Parliament, the Council and the European Economic and Social Committee on the future of VAT: Towards a simpler, more robust and efficient VAT system tailored to the single market*, COM(2011) 851 final (6 Dec. 2011)
- European Commission, *Proposal for a Sixth VAT Directive on the Harmonization of Legislation of Member States Concerning Turnover Taxes – Common System of Value Added Tax: Uniform Basis of Assessment*, COM(73) 95 (20 June 1975)
- European Commission, *Explanatory Notes on the EU VAT Changes to the Place of Supply of Telecommunications, Broadcasting and Electronic Services That Enter into Force in 2015* (3 April 2014)
- European Commission, *Guide to the VAT Mini One Stop Shop* (23 Oct. 2013)
- European Commission, *Information Notice: Test Case For Private Ruling Requests Relating to Cross-Border Situations* (June 2013), available at: http://ec.europa.eu/taxation_customs/resources/documents/taxation/vat/vat-forum-note-information_en.pdf
- European Parliament, Resolution 2011/2082(INI) of 13 Oct. 2011
- Eurostat, *Taxation Trends in the European Union* (2013)
- Expert Group on Taxation of Digital Economy, *Report* (28 May 2014), available at: http://ec.europa.eu/taxation_customs/resources/documents/taxation/gen_info/good_governance_matters/digital/report_digital_economy.pdf
- Fairfield, J., *Virtual Property*, 85 *Boston University Law Review* 1047 (2005)
- Farag, R., *U.S. Tax Considerations for Foreign Software Companies Engaged in Cloud Commerce*, 24 *Journal of International Taxation* 12 (2013)
- Federal Bureau of Investigation, *Bitcoin Virtual Currency: Unique Features Present Distinct Challenges for Deterring Illicit Activity* (24 Apr. 2012)
- Finance Ministry of the Netherlands, *Antwoord van de Minister van Financiën op vragen van het lid Nijboer (PvdA) aan de minister van Financiën over de opkomst van de Bitcoin als digitale betaaleenheid (ingezonden 10 april 2013)*
- Financial Crimes Enforcement Network, *Application of FinCEN's Regulations to Persons Administering, Exchanging, or Using Virtual Currencies* (18 Mar. 2013), FIN-2013-G001

- Finnish Tax Administration (*Vero Skatt*), *Inkomstbeskattning av virtuella valutor* (28 Aug. 2013), available at: [www.vero.fi/sv-FI/Detaljerade_skatteanvisningar/Inkomstbeskattning_av_personkunder/Inkomstbeskattning_av_virtuella_valutor\(28454\)](http://www.vero.fi/sv-FI/Detaljerade_skatteanvisningar/Inkomstbeskattning_av_personkunder/Inkomstbeskattning_av_virtuella_valutor(28454))
- Fischer, I., *The Nature of Capital and Income* (Macmillan 1912)
- French Tax Administration (*La Direction générale des Finances publiques*), *Régime fiscal applicable aux bitcoins* (11 July 2014), available at: <http://bofip.impots.gouv.fr/bofip/9515-PGP?branch=2>
- Gamage, D. & D.J. Heckman, *A Better Way forward for State Taxation of E-commerce*, 92 B.U.L. Rev. 483 (2012)
- Gaylord, S.W. & A. Haile, *Constitutional Threats in the E-Commerce Jungle: First Amendment and Dormant Commerce Clause Limits on Amazon Laws and Use Tax Reporting Statutes*, 89 N.C. L. Rev. (2011)
- Government Accountability Office, *Report to the Committee on Finance, U.S. Senate. Virtual Economies and Currencies. Additional IRS Guidance Could Reduce Tax Compliance Risks* (May 2013)
- Grashoff, D. & F. Kleinmanns, *Aktuelles Steuerrecht 2012* (Verlag C.H. Beck 2012)
- Grinberg, R., *Bitcoin: An Innovative Alternative Digital Currency*, 4 Hastings Science & Technology Law Journal 160 (2011)
- Guo, J., A. Chow & R.T. Wigand, *Virtual Wealth Protection through Virtual Money Exchange*, *Electronic Commerce Research and Applications* 10 (2010)
- Guo, Y. & S. Barnes, *Why People Buy Virtual Items in Virtual Worlds with Real Money*, 38 ACM SIGMIS Database 4, pp. 69–76 (2007)
- Habel, O., *Eine Welt ist nicht genug – virtuelle Welten im Rechtsleben*, *Multimedia und Recht* 2, pp. 71–77 (2008)
- Haig, R., *The Concept of Income – Economic and Legal Aspects* in: Haig (ed.), *The Federal Income Tax* (Columbia University Press 1921)
- Haile, A., *Affiliate Nexus in E-Commerce*, *Elon Univ. Sch. of Law, Legal Studies Research Paper No.2011-04*, available at: <http://ssrn.com/abstract=1924510>
- Hayek, F.A., *Denationalization of Money: The Argument Refined*, 3rd ed. (IEA 1990)
- Heeks, R., *Current Analysis and Future Research Agenda on “Gold Farming”: Real-World Production in Developing Countries for the Virtual Economies of Online Games*, *Working Paper No. 32* (2008), available at: www.sed.manchester.ac.uk/idpm/research/publications/wp/di/di_wp32.htm
- Heinsen O. & O. Voss, *Cloud Computing under Double Tax Treaties: A German Perspective*; 40 *Intertax* 11 (2012)
- Hellerstein, W., *Jurisdiction to Tax Income and Consumption in the New Economy: A Theoretical and Comparative Perspective*, 38 *Georgia Law Review* 1 (2003), available at http://digitalcommons.law.uga.edu/cgi/viewcontent.cgi?article=1125&context=fac_artchop
- Hellerstein, W., *State Taxation of Interstate Business: Perspectives on Two Centuries of Constitutional Adjudication*, 41 *Tax L.* 37 (1987)
- Hellerstein, W., *Jurisdiction to Tax in the Digital Economy: Permanent and Other Establishments*, 68 *Bull. Intl. Taxn.* 6/7 (2014)

- Hellerstein, J., *State Taxation under the Commerce Clause: An Historical Perspective*, 29 Vand. L. Rev. 335 (1976)
- Henchman, J., *Amazon Taxes*, The Tax Foundation (July/August 2012)
- Hermann/Heuer/Raupach *Einkommensteuergesetz. Kommentar* (Otto Schmidt Verlag 2008)
- Holmes, K., *The Concept of Income* (IBFD 2001)
- Holmes, K., *International Tax Policy and Double Tax Treaties* (IBFD 2007)
- HMRC, *Athletes: Trade/profession or hobby*, available at: www.hmrc.gov.uk/manuals/bimmanual/BIM50605.htm
- HMRC, *Capital allowances on plant and machinery*, available at: www.hmrc.gov.uk/capital-allowances/plant.htm
- HMRC, *Capital Gains Tax on personal possessions: the basics*, available at www.hmrc.gov.uk/cgt/possessions/basics.htm#2
- HMRC, *Capital Gains Tax rates and allowances*, available at www.hmrc.gov.uk/rates/cgt.htm#1
- HMRC, *Income Tax – the basics*, available at www.hmrc.gov.uk/incometax/basics.htm#6
- HMRC, *Miscellaneous income: scope of the provisions: overview*, available at: www.hmrc.gov.uk/manuals/bimmanual/BIM80101.htm
- HMRC, *Miscellaneous income: scope of the provisions: isolated sales of assets*, available at: www.hmrc.gov.uk/manuals/bimmanual/BIM80135.htm
- HMRC, *Miscellaneous income: scope of the provisions: series of sales of assets*, available at: www.hmrc.gov.uk/manuals/bimmanual/BIM80140.htm
- HMRC, *Non-residents trading in the UK: place of contract may not be decisive*, available at: <http://www.hmrc.gov.uk/manuals/intmanual/INTM263050.htm>
- HMRC, *Residence, domicile and the remittance basis*, available at www.hmrc.gov.uk/cnr/hmrc6.pdf
- HMRC, *Schedule D: Meaning of property*, available at: www.hmrc.gov.uk/manuals/bimmanual/bim14070.htm
- HMRC, *Schedule D: Relationship to Capital Gains Tax*, available at: www.hmrc.gov.uk/MANUALS/bimmanual/BIM14055.htm
- HMRC, *Selling items online, through classified advertisements and at car boot sales*, available at www.hmrc.gov.uk/guidance/selling/examples.htm
- HMRC, *Trade: general: hobbies and artificial trades*, available at: www.hmrc.gov.uk/manuals/bimmanual/bim20090.htm.
- HMRC, *VAT Business and Non-Business activities: hobbies*, available at: www.hmrc.gov.uk/manuals/vbnbmanual/VBNB27000.htm
- HMRC, *VFOOD6260 – Excepted items: Confectionery: The bounds of confectionery, sweets, chocolates, chocolate biscuits, cakes and biscuits: The borderline between cakes and biscuits*, available at: <http://www.hmrc.gov.uk/manuals/vfoodmanual/vfood6260.htm>
- Hunt, K., *This Land Is Not Your Land: Second Life, CopyBot, and the Looming Question of Virtual Property Rights*, 9 Texas Review of Entertainment and Sports Law 141 (2007)
- ICANN, *Beginner's Guide to Internet Protocol (IP) Addresses* (2011), available at: <http://www.icann.org/en/about/learning/beginners-guides>

- Inland Revenue Authority of Singapore (IRAS), *GST treatment for e-Commerce transactions* (2014), available at: http://www.iras.gov.sg/irashome/page04.aspx?id=2276#sale_of_virtual_currency
- Interactive Services Association Task Force, *White Paper on Cyberspace Tax Policy*, 8 Intl. VAT Mon. 3 (1997)
- Internal Revenue Service, *Tax consequences of virtual world transactions*, available at: www.irs.gov/Businesses/Small-Businesses-&Self-Employed/Tax-Consequences-of-Virtual-World-Transactions
- Internal Revenue Service, *IRC Section 6050W – Frequently Asked Questions*, available at: www.irs.gov/pub/irs-utl/irdm_section_6050w_faqs_7_23_11.pdf
- Jahn, R., *Steuerliche Abgrenzung gewerblicher Tätigkeit von freiberuflicher und sonstiger Tätigkeit*, Der Betrieb, p. 1947 (31 Aug. 2012).
- Jankowich, A., *EULLaw: The Complex Web of Corporate Rule-Making in Virtual Worlds*, 8 Tulane Journal of Technology & Intellectual Property 1 (2006)
- Johnson, D.R. & D.G. Post, *Law and Borders – The Rise of Law in Cyberspace*, 48 Stanford Law Review 1367 (1996), available at <http://ssrn.com/abstract=535>
- Joint Committee on Taxation, *Estimates of Federal Tax Expenditures for Fiscal Years 2011-2015* (2012)
- Joint Economic Committee, *Virtual Economies Need Clarification, Not More Taxes*, Press Release of 17 Oct. 2006, available at www.jec.senate.gov/republicans/public/?a=Files.Serve&File_id=08e6fa84-ee4f-4267-9f47-ad0ad33a072d
- Kadel, J., *Einkommensermittlung und Rechnungslegungsmethoden im US-amerikanischen Steuerrecht*, IStR 13 (2001)
- Kahan, D., *Signaling or Reciprocating? A Response to Erich Posner's Law and Social Norms*, 36 Richmond Law Review 367 (2002)
- Kesteren, H. Van, *Society's Online Revolution and the Short Arms of the Tax Authorities in: VAT in an EU and International Perspective* (H. van Arendonk, S. Jansen & R. van der Paard eds. IBFD 2011), Online Books IBFD
- Kirchhof, P. et al., *Einkommensteuergesetz. Kommentar* (Otto Schmidt Verlag 2011).
- Kirkbridge, J. & A.A. Olowofoyeku, *Revenue Law, Principles and Practice* p. 11 (Tudor Business Publishing 1992)
- Klickermann, P., *Virtuelle Welte ohne Rechtsansprüche?* Multimedia und Recht 12, pp. 766-769 (2007)
- Kochan, D.J., *The Property Platform in Anglo-American Law and the Primacy of the Property Concept*, 29 Georgia State University Law Review 2 (2013)
- Krassmann, H., *Onlinespielrecht – Spielweise für Juristen*, Multimedia und Recht 6, pp. 351-357 (2006)
- Krever, R., *Interpreting income tax laws in the common law world in: Steuerrecht, Verfassungsrecht, Europarecht. Festschrift für Hans Georg Ruppe* (Facultas Verlags- und Buchhandels AG 2007)
- Kwall, J., *When Should Asset Appreciation Be Taxed?: The Case for a Disposition Standard of Realization*, 86 Indiana Law Journal 77 (2011)
- Lamensch, M., *Proposal for Implementing the EU One-Stop-Shop Scheme from 2015*, 23 Intl. VAT Monitor 5 (2012)

- Lang, M., *Introduction to the Law of Double Taxation Conventions* (IBFD and Linde 2013)
- Lastowka, F.G. & D. Hunter, *The Laws of the Virtual Worlds*, University of Pennsylvania Law School, Public Law and Legal Theory Research Paper Series Research Paper No. 26 (May 2003)
- Lederman, L., *Stranger than Fiction: Taxing Virtual Worlds*, 82 New York University Law Review 1620 (2007)
- Lederman, L., *Reducing Information Gaps to Reduce the Tax Gap: When Is Information Reporting Warranted?* 78 Fordham Law Review 1733 (2010).
- Lederman, L., *Statutory Speed Bumps: The Roles Third Parties Play in Tax Compliance*, 60 Stanford Law Review 695 (2007)
- Lee, N. et al., *Revenue Law: Principles and Practice*, 28th ed. (Bloomsbury 2010)
- Lehdonvirta, V. & M. Ernkvist, *Knowledge Map of the Virtual Economy* (2011), available at: <http://www.infodev.org/en/Publication.1056.html>
- Littmann, E. et al., *Das Einkommensteuerrecht: Kommentar* (Schäffer-Poeschel 2010)
- Lober, A. & O. Weber, *Money for nothing? Der Handel mit virtuellen Gegenständen und Charakteren*, *Multimedia und Recht* 10, pp. 653-660 (2005)
- Lokken, L., *Income Effectively Connected with U.S. Trade or Business: A Survey and Appraisal*, *Taxes – The Tax Magazine* (Mar. 2008)
- Lowry, S.K., *Property Rights in Virtual Reality: All's Fair in Life and Warcraft?* 15 Texas Wesleyan Law Review 109 (2008-2009)
- Lowy M. & M. Abraham, *Taxation of Virtual Currency*, 2013 Tax Notes Today 219-10 (13 Nov. 2013)
- Lusch, S., *State Taxation of Cloud Computing*, 29 Santa Clara Computer & High Tech. L. J. 369 (2013)
- Mack, D., *iTax: an Analysis of the Laws and Policies behind the Taxation of Property Transactions in a Virtual World*, 60 Administrative Law Review (2008)
- Marian, O., *Are Cryptocurrencies Super Tax Havens?* 112 Michigan Law Review 38 (2013).
- Maurer, B., T.C. Nelms & L. Schwarz, "When perhaps the real problem is money itself": *the practical materiality of Bitcoin*, 23 Social Semiotics 2 (2013)
- Macintosh, K.L., *How to Encourage Global Electronic Commerce: The Case for Private Currencies on the Internet*, 11 Harvard Journal of Law and Technology 3, pp. 733-796 (1998)
- Mayer, T., *A Lawyer's Take on Bitcoin and Taxes* (Premier Ark 2012)
- McLure, C.E. Jr., *Tax Competition in a Digital World*, 57 Bull. Intl. Fisc. Doc. 4 (2003)
- McLure, C.E. Jr., *EU and US Sales Taxes in the Digital Age: A comparative Analysis*, 56 Bull. Intl. Fisc. Doc. 4 (2002)
- McLure, C.E. Jr., *How to Coordinate State and Local Sales Taxes with a Federal Value-Added Tax*, 63 Tax Law Review 3 (2010)
- McLure, C.E. Jr., *Taxation of Electronic Commerce: Economic Objectives, Technological Constraints and Tax Laws*, 52 Tax Law Review 269 (1997)
- McLure, C.E. Jr. & P. Merrill, *Why Doesn't the United States Use a VAT for Deficit Reduction? Political Impediments and Fiscal Coordination Issues*, 67 Bull. Intl. Taxn. 4/5 (2013).
- McNulty, K. & D.L. Lathrope, *Federal Income Taxation of Individuals*, 8th ed. (West 2002)

- Miano, T., *Virtual World Taxation: Theories of Income Taxation Applied to the Second Life Virtual Economy* (2007), available at: http://works.bepress.com/timothy_miano/1
- Morse, G.K. & D. Williams, *Principles of tax law*, 6th ed. (Sweet & Maxwell 2008)
- Musgrave, R.A., *In Defense of an Income Concept*, 81 *Harvard Law Review* 45 (1967)
- Nakamoto, S., *Bitcoin: A Peer-to-Peer Electronic Cash System* (2009), available at: <http://bitcoin.org/bitcoin.pdf>
- National Taxpayer Advocate, *2008 Annual Report to Congress*, available at: http://www.irs.gov/pub/irs-utl/08_tas_arc_intro_toc_msp.pdf
- National Taxpayer Advocate, *2013 Annual Report to Congress*, available at: <http://www.taxpayeradvocate.irs.gov/userfiles/file/2013FullReport/DIGITAL-CURRENCY-The-IRS-Should-Issue-Guidance-to-Assist-Users-of-Digital-Currency.pdf>
- Nakazaki, T., *Real World Excessive Regulations Might Kill Economic Transactions in Virtual Worlds*, *Journal of Internet Law*, pp. 3-5 (June 2011)
- Nelson, B.M. et al., *Sales and Use Tax Answer Book* (CCH 2013)
- New Jersey State Tax News*, vol. 30, no. 1 (Spring 2007), available at: <http://www.state.nj.us/treasury/taxation/pdf/pubs/stn/spring07.pdf>
- Niemeier, G. et al., *Einkommensteuer* (Erich Fleischer Verlag 2009)
- Norwegian Tax Authorities (*Skatteetaten*), *Bruk av bitcoins – skatte- og avgiftsmessige konsekvenser* (11 Nov. 2013), available at: <http://www.skatteetaten.no/no/Radgiver/Rettskilder/Uttalelser/Prinsipputtalelser/Bruk-av-bitcoins--skatte-og-avgiftsmessige-konsekvenser/>
- Oates, L., & A. Miller, *Principles of International Taxation* (Bloomsbury 2012)
- Ochoa, T.T., *Who Owns an Avatar? Copyright, Creativity, and Virtual Worlds*, 14 *Vanderbilt J. of Ent. & Tech. Law* 959 (2011-2012)
- OECD, *A Borderless World: Realizing the Potential of Global Electronic Commerce* (1998)
- OECD, *Taxation and Electronic Commerce: Implementing the Ottawa Taxation Framework Conditions* (2001)
- OECD, *Consumption Tax Trends* (2012)
- OECD, *Addressing Base Erosion and Profit Shifting* (2013), available at www.oecd.org/tax/beps.htm
- OECD, *Action Plan on Base Erosion and Profit Shifting* (2013), available at www.oecd.org/ctp/BEPSActionPlan.pdf
- OECD, *BEPS Action 1: Address the Tax Challenges of the Digital Economy (Public Discussion Draft)* (2014), available at www.oecd.org/ctp/tax-challenges-digital-economy-discussion-draft-march-2014.pdf
- Orman, L.V., *Virtual Money in Electronic Markets and Communities* (1996), available at: http://papers.ssrn.com/sol3/papers.cfm?abstract_id=1621725.
- Pahlke, A. & U. Koenig, *Abgabenordnung* (C.H. Beck 2009)
- Pareja, S., *Taxation without Liquidation: Rethinking "Ability to Pay"*, *Wisconsin Law Review* 841 (2008)
- Passman, M.H., *Transactions of Virtual Items in Virtual Worlds*, 18 *Albany Law Journal of Science & Technology* 259 (2008)
- Peeters, B., *European Supervision on the Use of Vague and Undetermined Concepts in Tax Laws*, *EC Tax Review* 3 (2013)

- Penner, R.G., *Do We Need A VAT to Solve Our Long-Run Budget Problems?* 63 *Tax L. Rev.* 2 (2010)
- Philips, J., *Bytes of Cash: Banking, Computing and Personal Finance*, 1 *First Monday Review* 5 (1996)
- Pinto, D., *E-commerce and Source-based Income Taxation* (IBFD 2003)
- Plasschaert, S., *The Definition of Gross Taxable Income in Schedular or Global Income Taxes*, 31 *Bull. Intl. Fisc. Doc.* 12 (1977)
- Plasschaert, S., *First Principles about Schedular and Global Frames of Income Taxation*, 30 *Bull. Intl. Fisc. Doc.* 3 (1976)
- Plassars, N.A., *Regulating Digital Currencies: Bringing Bitcoin within the Reach of the IMF*, 14 *Chicago Journal of International Law* 377 (2013)
- Posner, E., *Law and Social Norms: The Case of Tax Compliance*, 86 *Virginia Law Review* 1781 (2000)
- Reid, F. & M. Harrigan, *An Analysis of Anonymity in the Bitcoin System* (2012), available at: <http://arxiv.org/abs/1107.4524>
- Rendahl, P., *Cross-border Consumption Taxation of Digital Supplies: a Comparative Study of Double Taxation and Unintentional Non-taxation of B2C-commerce* (IBFD 2009)
- Reuveni, E., *On Virtual Worlds: Copyright and Contract at the Dawn of the Virtual Age*, 82 *Indiana Law Journal* 261 (2007)
- Rippert, S. & K. Weimer, *Rechtsbeziehungen in der virtuellen Welt*, *Zeitschrift für Urheber- und Medienrecht* 4, pp. 272-281 (2007)
- Roscoe, E., *Taxing Virtual Worlds: Can the IRS PWN You?* 12 *Pittsburgh Journal of Technology Law and Policy* 2 (2011)
- Royal Commission on the Taxation of Profits and Income, *Final Report Cmd 9474* (1955), *Comments on what is a trade*
- Schenk, A. & O. Oldman, *Value Added Tax* (Cambridge University Press 2007)
- Schenk, D.H., *A Positive Account of the Realization Rule*, 57 *Tax Law Review* (2003-2004)
- Schmidt: *Einkommensteuergesetz. Kommentar* (C.H. Beck 2012)
- Schmidt-Liebig, A., *Einkommensteuerbarkeit und Einkunftsqualifikation von Spiel- und ähnlichen Gewinnen*, *Steuer und Wirtschaft* 2 (1995)
- Seer, R., *Voluntary Compliance*, 67 *Bull. Intl. Taxn.* 11 (2013)
- Šemeta, A., *The Mini-One Stop Shop for VAT – The Start of Something Big!* (2012), available at: www.worldcommercereview.com/publications/article_pdf/617
- Seto, T., *When a Game is only a Game?: The Taxation of Virtual Worlds*, *Loyola-LA Legal Studies Paper No. 2008-24* (2008)
- Shakow, D.J., *The Taxation of Cloud Computing and Digital Content*, 140 *Tax Notes* 333 (22 July 2013)
- Shaviro, D.N., *An Efficiency Analysis of Realization and Recognition Rules Under The Federal Income Tax*, 48 *Tax Law Review* 1 (1992)
- Siemens, C. von, *Veredelte Umsatzsteuer* (Siemensstadt 1919)
- Simons, H., *Personal Income Taxation – The Definition of Income as a Problem of Fiscal Policy* (University of Chicago Press 1983)
- Slovenian Ministry of Finance (*Davèna uprava Republike Slovenije*), *Davèna obravnavava poslovanja z virtualno valuto po zdoh-2 in zddpo-2* (23 Dec. 2012), available at: www.durs.gov.si/si/davki_predpisi_in_pojasnila/dohodnina_pojasnila/dohodek_iz_

- kapitala/dobicek_iz_kapitala/vrednostni_papirji_in_delezi_v_gospodarskih_druzbah_zadrugah_in_drugih_oblikah_organiziranja_ter_investicijski_kuponi/davcna_obravnavna_poslovanja_z_virtualno_valuto_po_zdoh_2_in_zddpo_2/
- Sorge, C. & A. Krohn-Grimberghe, *Bitcoin: Eine erste Einordnung*, Danteschutz und Datensicherheit 7 (2012)
- South Dakota Department of Revenue, *Factsheet "Products Transferred Electronically"* (Mar. 2011), available at: <http://www.state.sd.us/drr2/businessstax/publications/taxfacts/digital.pdf>
- Stark, K., *Enslaving the Beachcomber: Some Thoughts on the Liberty Objections to Endowment Taxation*, 18 Canadian Journal of Law & Jurisprudence 47 (2005)
- Steele, T.S. et al., *The 'Amazon' Laws and the Perils of Affiliate Advertising*, 59 St. Tax Notes 939 (28 Mar. 2011)
- Stewart, D.D. & S.S. Johnston, *Digital Currency: A New Worry for Tax Administrators?* Tax Notes (29 Oct. 2012)
- Stokes, R., *Virtual Money Laundering: the Case of Bitcoin and the Linden Dollar*, 21 Information & Communications Technology Law 3 (2012)
- Tappe, H., *Steuerliche Betriebsstätten in der "Cloud": neuere technische Entwicklungen im Bereich des E-Commerce als Herausforderung für den ertragsteuerrechtlichen Betriebsstättenbegriff*, 20 Internationales Steuerrecht 22, pp. 870-874 (2011)
- Taussing, F.W., *Principles of Economics* (Macmillan 1947)
- Tax Analysts, *The VAT Reader: What would a Federal consumption Tax Mean for America?* (2011)
- Terando, W.D. et al., *Taxation Policy in Virtual Worlds: Issues Raised by Second Life and Other Unstructured Games*, 6 Journal of Legal Tax Research 94 (2008)
- Terando, W.D. et al., *It's Just a Game, or is it? Real Money, Real Income; Real Taxes in Virtual Worlds*, Communications of the Association for Information Systems, vol. 20 (2007)
- Terra, B.J.M., & J. Kajus, *Introduction to European VAT (Recast)* (2012), Online Books IBFD
- Terra, B.J.M., & J. Kajus, *A Guide to the Recast VAT Directive* (2012), Online Books IBFD
- Terra, B.J.M., & P.J. Wattel, *European Tax Law*, 6th ed. (Kluwer Law International 2012)
- Thuronyi, V., *The Concept of Income*, 46 Tax Law Review (1990)
- Thuronyi, V. (ed.), *Tax law design and drafting* (IMF 1998)
- Thuronyi, V., *Comparative Tax Law* (Kluwer Law International 2003)
- Tiley, J. et al., *Tiley and Collison's UK Tax Guide 2012-2012* (LexisNexis 2012)
- Tipke, K. & J. Lang, *Steuerrecht*, 21st ed. (Otto Schmidt Verlag 2013)
- US Census Bureau, *State Government Tax Collections Summary Report: 2011* (12 Apr. 2012), available at: <http://www2.census.gov/govs/statetax/2011stcreport.pdf>
- US Census Bureau, *E-commerce 2010*, (10 May 2012), available at: <http://www.census.gov/econ/estats/2010/2010reportfinal.pdf>
- US Treasury, *Selected Tax Policy Implications of Global Electronic Commerce* (22 Nov. 1996), available at: <http://www.treasury.gov/resource-center/tax-policy/Documents/internet.pdf>

- Vacca, R., *Viewing Virtual Property Ownership through the Lens of Innovation*, 76 Tennessee Law Review 33 (2008)
- Vetter, W.V., *A Preliminary Investigation of Taxation of Virtual Worlds*, Tax Analysts Special Report (17 Mar. 2008)
- Volanis, N., *Legal and policy issues of virtual property*, 3 International Journal of Web Based Communities 3 (2007)
- Walpole, M. & J. Gray, *Taxing Virtually Everything: Cyberspace Profits, Property Law And Taxation Liability*, 39 Australian Tax Review 1, p. 39 (2010)
- Wang, Y. & S. Mainwaring, *Human–Currency Interaction: Learning from Virtual Currency use in China*, Proceedings of the 26th International Conference on Human Factors in Computing Systems, Florence, Italy, April 5–10, pp. 25–28 (ACM Press 2008)
- Wei Dai, *B-Money* (1998), available at: <http://weidai.com/bmoney.txt>
- Westberg, B., *Cross-border Taxation of E-commerce* (IBFD 2002)
- Westbrook, T., *Owned: Finding A Place for Virtual World Property Rights*, Michigan State Law Review 779 (2006)
- Westin, R.A., *International Taxation of Electronic Commerce* (Kluwer Law International 2007)
- Williams, C., *Technology Can Solve MTIC Fraud – 2*, 22 Intl. VAT Mon. 4 (2011)
- Whiteman, P.G. et al., *Whiteman on Capital Gains Tax* (Sweet & Maxwell 2008)
- Wohlfahrt, B., *The Future of the European VAT System*, 22 Intl. VAT Mon. 6 (2011)
- Wueller, P.H., *Concepts of Taxable Income I – The German Contribution*, 53 Political Science Quarterly 1 (1938)
- Yetter, D.L., *United States – VAT & Sales Tax*, Topical Analyses IBFD

Curriculum vitae

Aleksandra Bal is Manager at the International Bureau for Fiscal Documentation (IBFD) in Amsterdam and Managing Editor of the IBFD journal *Bulletin for International Taxation*. She holds a degree in Business Administration (B.Sc.) from European University Viadrina in Frankfurt (Oder), Germany, and a joint degree in German and Polish Law from European University Viadrina and University of Poznań, Poland. She continued her education in the Netherlands, where she obtained two master degrees from Maastricht University (LL.M. International and European Tax Law and M.Sc. Fiscal Economics). Prior to joining IBFD, Ms Bal worked as an auditor and tax consultant for Big4 companies in Germany. She publishes regularly on a wide variety of tax topics.

In the range of books published by the Meijers Research Institute and Graduate School of Leiden Law School, Leiden University, the following titles were published in 2013 and 2014

- MI-214 C.M. Smyth, *The Common European Asylum System and the Rights of the Child: An Exploration of Meaning and Compliance*, (diss. Leiden), Leiden 2013
- MI-215 A.F. Mollema, *Het beperkte recht. Een analyse van zijn theoretische constructie, zijn plaats in het systeem van het vermogensrecht en zijn mogelijke inhoud*, (diss. Leiden), Leiden: Uitgeverij BOXPRESS 2013, ISBN 978 90 8891 597 0
- MI-216 V.S. Bouman, *De baai geblokkeerd: piraten in het nauw? Een onderzoek naar de toelaatbaarheid en het effect van het blokkeren van The Pirate Bay*, (Jongbloed scriptieprijs 2012), Den Haag: Jongbloed 2013, ISBN 978 90 7006 268 2
- MI-217 C.G. Breedveld-de Voogd, A.G. Castermans, M.W. Knigge, T. van der Linden, J.H. Nieuwenhuis & H.A. ten Oever (red.), *Rechtsvinding in een meerlagige rechtsorde*. BWKJ nr. 28, Deventer: Kluwer 2013, ISBN 978 90 1311 482 9
- MI-218 J.M. ten Voorde, C.P.M. Cleiren & P.M. Schuyt, *Meerdaadse samenloop in het strafrecht. Een onderzoek naar doel, grondslag, karakter, strekking en functie van de wettelijke regeling van meerdaadse samenloop (artikel 57-63 Sr)*, Den Haag: Boom Juridische uitgevers 2013, ISBN 978 90 8974 843 0
- MI-219 J. Nijland, *De overheidsonderneming. Overheidsinvloed in kapitaalvennootschappen nader beschouwd*, (diss. Leiden), Leiden: Uitgeverij BOXPRESS 2013, ISBN 978 90 8891 719 6
- MI-220 K.M.P. Setiawan, *Promoting Human Rights. National Human Rights Commissions in Indonesia and Malaysia*, (diss. Leiden), Leiden: Leiden University Press 2013, ISBN 978 90 8728 203 5, e-isbn 978 94 0060 166 6 (pdf), e-isbn 978 94 0060 167 3 (ePub)
- MI-221 J. Uzman, *Constitutionele remedies bij schending van grondrechten. Over effectieve rechtsbescherming, rechterlijk absteren en de dialoog tussen rechter en wetgever*, (diss. Leiden), Deventer: Kluwer 2013, ISBN 978 90 1312 059 2
- MI-222 D.A. Dam-de Jong, *International law and governance of natural resources in conflict and post-conflict situations*, (diss. Leiden), Zutphen: Wöhrmann 2013, ISBN 978 94 6203 475 4
- MI-223 W. Geelhoed, *Het opportuniteitsbeginsel en het recht van de Europese Unie. Een onderzoek naar de betekenis van strafvoorderlijke beleidsvrijheid in de geëuropeïseerde rechtsorde*, (diss. Leiden), Deventer: Kluwer 2013, ISBN 978 90 1312 132 2
- MI-224 A.F. Rommelse, *De arbeidsongeschiktheidsverzekering: tussen publiek en privaat. Een beschrijving, analyse en waardering van de belangrijkste wijzigingen in het Nederlandse arbeidsongeschiktheidsstelsel tussen 1980 en 2010*, (diss. Leiden), Leiden: Leiden University Press 2014, ISBN 978 90 8728 205 9, e-ISBN 978 94 0060 170 3
- MI-225 L. Di Bella, *De toepassing van de vereisten van causaliteit, relativiteit en toerekening bij de onrechtmatige overheidsdaad*, (diss. Leiden), Deventer: Kluwer 2014, ISBN 978 90 1312, e-ISBN 978 90 1312 041 7 040 0
- MI-226 H. Duffy, *The 'War on Terror' and International Law*, (diss. Leiden), Zutphen: Wöhrmann 2013, ISBN 978 94 6203 493 8
- MI-227 A. Cuyvers, *The EU as a Confederal Union of Sovereign Member Peoples. Exploring the potential of American (con)federalism and popular sovereignty for a constitutional theory of the EU*, (diss. Leiden), Zutphen: Wöhrmann 2013, ISBN 978 94 6203 500 3.
- MI-228 M.J. Dubelaar, *Betrouwbaar getuigenbewijs. Totstandkoming en waardering van strafrechtelijke getuigenverklaringen in perspectief*, (diss. Leiden), Deventer: Kluwer 2014, ISBN 978 90 1312 232 9
- MI-229 C. Chamberlain, *Children and the International Criminal Court. Analysis of the Rome Statute through a Children's Rights Perspective*, (diss. Leiden), Zutphen: Wöhrmann 2014, ISBN 978 94 6203 519 5
- MI-230 R. de Graaff, *Something old, something new, something borrowed, something blue?, Applying the general concept of concurrence on European sales law and international air law*, (Jongbloed scriptieprijs 2013), Den Haag: Jongbloed 2014, ISBN 978 90 7006 271 2
- MI-231 H.T. Wermink, *On the Determinants and Consequences of Sentencing*, (diss. Leiden) Amsterdam: Ipskamp 2014, ISBN 978 90 7006 271 2

- MI-232 A.A.T. Ramakers, *Barred from employment? A study of labor market prospects before and after imprisonment*, (diss. Leiden) Amsterdam: Ipskamp 2014, ISBN 978 94 6259 178 3
- MI-233 N.M. Blokker et al. (red.), *Vijftig juridische opstellen voor een Leidse nachtwacht*, Den Haag: Boom Juridische uitgevers 2014, ISBN 978 90 8974 962 8
- MI-234 S.G.C. van Wingerden, *Sentencing in the Netherlands. Taking risk-related offender characteristics into account*, (diss. Leiden), Den Haag: Boom Lemma 2014, ISBN 978 94 6236 479 0
- MI-235 O. van Loon, *Binding van rechters aan elkaars uitspraken in bestuursrechterlijk perspectief*, (diss. Leiden), Den Haag: Boom/Lemma 2014, ISBN 978 94 6290 013 4
- MI-236 L.M. Raijmakers, *Leidende motieven bij decentralisatie. Discours, doelstelling en daad in het Huis van Thorbecke*, (diss. Leiden), Deventer: Kluwer 2014, ISBN 978 90 1312 7772 0
- MI-237 A.M. Bal, *Taxation of virtual currency*, (diss. Leiden), Zutphen: Wöhrmann 978 94 6203 690 1

For the complete list of titles (in Dutch), see: www.law.leidenuniv.nl/onderzoek/publiceren