

Tax Arbitrage Through Cross Border Financial Engineering The Use Of Hybrids Synthetics And Non Traditional Financial Instruments

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In the context of cross-border finance, the term arbitrage is used to describe the exploitation by multinational groups of asymmetries between different tax regimes (tax regimes do not always match...

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Tax Arbitrage through Cross-Border Financial Engineering is a comprehensive exploration of tax arbitrage opportunities ensuing from financial engineering techniques with cross-border financial instruments. You'll discover how to enhance your practice by making use of complex types of arrangements such as hybrids, synthetics, and non-traditional financial instruments, which are able to meet the criteria for

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This book explores tax arbitrage opportunities resulting from financial engineering techniques with cross-border financial instruments such as hybrids, synthetics, and non-traditional financial instruments. Firstly the author clarifies the concept of three kinds of complex financial instruments, and thereafter he discusses the most adequate tax treatment of these instruments in cross-border ...

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Tax Arbitrage Through Cross Border Financial Engineering ...

Abstract. This chapter discusses, including mathematical descriptions, trading strategies based on tax arbitrage, including municipal bond tax arbitrage, which amounts to borrowing money and buying tax-exempt municipal bonds, which is attractive to companies in jurisdictions where tax rules allow them to buy tax-exempt municipal bonds and deduct interest expenses from their taxable income, cross-border tax arbitrage exploiting the difference in the tax treatment of the foreign and domestic ...

Tax Arbitrage | SpringerLink

known as "cross-border tax arbitrages," although, as I have discussed elsewhere (Shaviro, 2004), they are not really arbitrages in a finance sense. During the Clinton Administration, the United States Treasury proposed to deny U. S. tax benefits to taxpayers engaging in certain of the transactions. Vehement opposition forced the Treasury to back

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International or cross-border tax arbitrage is the name frequently given to arrangements designed to produce tax savings through exploitation of differences between the U.S. and foreign tax rules on such matters as determining the source of income and deductions, classification of entities and determining the residents of entities for tax purposes.

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In its simplest terms, cross-border tax arbitrage refers to a situation in which a taxpayer or taxpayers rely on conflicts or differences between two countries' tax rules to structure a transaction or entity

One Nation Among Many: Policy Implications of Cross-Border ...

In its simplest terms, cross-border tax arbitrage refers to a situation in which a taxpayer or taxpayers rely on conflicts or differences between two countries' tax rules to structure a transaction or entity with the goal of obtaining tax benefits (for example, reduced or no taxation) overall.

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A main goal of the reform is to effectively reduce aggressive tax avoidance opportunities through cross-border dividend arbitrage. These transactions, known as "cum-cum-deals," have received heightened scrutiny in Germany following a highly-publicized media investigation that concluded that the scheme costs the German treasury millions of Euros in lost tax revenue.

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German lawmakers weigh proposal to curb tax avoidance ...

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