

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 favorable tax treatment in multiple jurisdictions.

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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 ...

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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

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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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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

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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 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.

German lawmakers weigh proposal to curb tax avoidance ...

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