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regimes do not always match...

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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

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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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hybrids, synthetics, and non-traditional financial instruments, which are

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This book explores tax arbitrage opportunities

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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

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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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techniques with cross border financial instruments

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•••
Instruments

Abstract. This chapter discusses, including

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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

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Border 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

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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

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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

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opposition forced the Treasury to back

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Border examines the credit by looking at the ex-day behavior of the stock price, it is closely related to the large literature on ex-day price effects, most of which uses U.S. data. In characterizing equilibrium,

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Border literature emphasizes the tax heterogeneity created by different classes of

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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

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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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Conducting Business Abroad?
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Hybrids, Synthetics And
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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

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Border two countries' tax rules to structure a transaction or entity

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Policy Implications of Cross-Border ...

In its simplest terms, cross-

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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

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benefits (for example, reduced or no taxation) overall.

ONE NATION AMONG MANY:
POLICY IMPLICATIONS OF CROSS-
BORDER ...

A main goal of the reform is

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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

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highly-publicized media investigation that concluded that the scheme costs the German treasury millions of Euros in lost tax revenue.

Instruments

German lawmakers weigh proposal to curb tax

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avoidance . . .

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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

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to meet . . .

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