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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

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always match...  
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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



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non-traditional financial  
instruments, which are able to  
meet the criteria for favorable tax  
treatment in multiple  
jurisdictions.

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complex types of arrangements  
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This book explores tax arbitrage

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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

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instruments, and thereafter he discusses the most adequate tax treatment of these instruments in cross-border ...

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border financial engineering is a comprehensive exploration of tax arbitrage opportunities ensuing from financial engineering techniques with cross border financial instruments

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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



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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

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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

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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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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, that 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 tax

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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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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



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

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proposal to curb tax avoidance ...  
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