



Tax Planning with Holding Companies - Repatriation of U.S. Profits from Europe: Concepts, Strategies, Structures (Eucotax Series on European Taxation)

Rolf Eicke

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When investments don't live up to their promise, the situation is typically due to several factors. In most cases, the key reasons are a combination of the place of investment, the product, and the selection of detrimental tax planning measures. Often, international tax planning tips the scales regarding the success of a U.S. investment in Europe.

This timely book analyzes concepts and structures that can be used as a "construction kit"; applying combinations of basic tools to meet the challenges of an ever-changing global tax environment. In the wake of globalization, a host of new tax planning opportunities is available to investors.

Techniques designed to legally reduce the relevant tax burden have simultaneously become more sophisticated and easier. Consequently this work analyzes concepts, risks, limits of tax planning, and introduces a model that allows tax professionals to structure and continuously re-evaluate their tax planning. Instead of relocating entire companies to other countries, firms can reduce their tax liability using the techniques and measures of tax planning described in the model.

The overall goal of the work is to analyze the problem of repatriating U.S. profits from Europe under an integrated and holistic approach, going far beyond the routing of income via different companies. Instead, the approach includes an analysis of the interdependencies between international tax competition, holding company regimes, and tax planning concepts in order to establish a basis for tax planning measures regardless of the fast changing legal environment for holding companies in the different countries.

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