



# The Limited Partnership in International Tax Planning

*Christos Mavrellis, Charles Haccius, Peter Alsted, Christian Strik, Francis Hoogewerf, Milton Grundy, Bernhard Vischer, Geoffrey Goodyear, Michael Thomas*

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A limited partnership may have an officially recognised presence in a jurisdiction, with an address and in some places a registered number, but nevertheless be treated as wholly transparent for tax purposes, with the consequence that it may receive income whose source is outside the jurisdiction and distribute it to partners who reside outside the jurisdiction, without giving rise to any tax liability in the jurisdiction in which it is established. This phenomenon offers a number of opportunities for international tax planning, notably in overcoming problems created by blacklists.

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