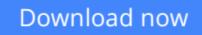


The Limited Partnership in International Tax Planning

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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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