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## EDITORIAL

The articles in this issue of the OITR span the globe – looking at tax issues in Europe and America, as well as offshore jurisdictions. The first article, by Jay Krause and Brad Westerfield, both of Withers LLP, looks at the one year repeal of the estate and GST taxes in the United States of America.

Also looking at “death taxes”, this time in Germany is an article from Dr. Andreas Richter and Dr. Jens Escher, both partners in P + P Pöllath and Partners in Berlin. It considers the new regime a year on.

The next article, by Robert Venables QC, consulting editor of the OITR, looks at the new Jersey foundations in the context of UK taxes. Robert has recently published “The Taxation of Foundations”, which looks at the ways in which those subject to United Kingdom tax can use foundations.

Also looking at Jersey, is an article by Harriet Brown (joint managing editor of this publication) who considers the new deemed dividend income tax regime, especially in light of the recent meeting between the Chief Minister of Jersey and Financial Secretary to HM Treasury, the outcome of which is likely to be that the deemed dividend provisions (with the rest of the zero/ten regime) will be scrapped before there is any opportunity for them to be properly considered.

Just across the Channel, Frederic Mege of Lawrence Graham LLP looks at the new measures included in the French Finance Act of 31 December 2009, which will affect Foreign companies owning French real estate.

Finally, Marco Bonalanza, of Aquilon Trust, talks about the taxation of trusts in Switzerland.

Robert Venables QC

Harriet Brown

February 2010