
THE OFFSHORE TAX PLANNING REVIEW
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Contents of Volume 5, Issue 1

CONTENTS

	Page No
From the Editors	v
Zero-Tax Companies: A Plain Man's Guide Milton Grundy	1
ICTA 1988 Section 739 and Double Taxation Relief: An Offshoot from <i>Willoughby</i> Stephen Brandon	9
Scottish Trustees, Investment Management and the use of Nominees or Custodians Simon Mackintosh	13
The Pitfalls of Guarantee Companies Julian Ghosh	21
Some Alternatives to Trusts Paul Matthews	31
Spain 1995: Proposed Changes in the 5% Special Tax Jonathan Miller	43
Mauritius and other Routes for Direct Investment into India Suzanne Gujadhur	53

From the Editors

EDITORIAL

This issue of the *Review* looks afresh at important issues which arise in private client offshore tax planning.

Paul Matthews considers entities which may be used in tax planning exercises as alternatives to trusts while Stephen Brandon considers the effect of the *Willoughby* decision of the Court of Appeal. The Managing Editor examines, in the first of a series of articles, some of the pitfalls which can arise in implementing guarantee company structures. We are particularly delighted to include a contribution from Simon Mackintosh in respect of Scots trusts and their application to offshore planning; we hope that this contribution will give rise to many more from Scots tax lawyers.

Non-UK jurisdictions receive scrutiny in three articles: Jonathan Miller considers proposals concerning the taxation of non-Spanish resident entities which hold property in Spain; "traditional" international tax planning, examining favourable jurisdictions and Double Tax Treaty networks, features in articles by Milton Grundy and Suzanne Gujadhur.

The Editors welcome contributions. The Editors particularly welcome debate on points raised in articles appearing in the *Review* (or indeed other Reviews and Journals). All articles (whether long or short), ideas for articles, and other correspondence on editorial matters should be addressed to: Julian Ghosh Esq, Managing Editor, Offshore Tax Planning Review, 24 Old Buildings, Lincoln's Inn, London WC2A 3UJ.

June 1995
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