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PRÉCIS
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DES ENTREPRISES

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Die Steuerumgehung Christine Osterloh-Konrad, 2020-01-07 English summary Christine Osterloh Konrad looks at how the different legal systems in Germany France Britain and the USA handle the phenomenon of tax avoidance Anti avoidance mechanisms are interpreted as attempts to deal with cases in which the result of applying a legal rule is at odds with the rule s justification The study develops a functional approach to general anti avoidance instruments and makes suggestions for their institutional design German description Die Debatte um die Steuerumgehung kreist weltweit um das Spannungsverhältnis von Rechtssicherheit und steuerlicher Belastungsgleichheit In einem breit angelegten Rechtsvergleich zwischen Deutschland Frankreich Grossbritannien und den USA untersucht Christine Osterloh Konrad die Fundamente Argumente und Instrumente dieses juristischen Mobiles und entwickelt eine rechtstheoretische Deutung der Reaktionen staatlicher Akteure auf Umgehungsversuche Auf dieser Basis lässt sich der Umgang des Rechts mit der Steuerumgehung als Optimierungsproblem begreifen bei dem es gilt Verlässlichkeit des Rechts und Besteuerungsgleichheit in einen Ausgleich zu bringen ohne institutionelle Kompetenzgrenzen sowie die Handlungsmöglichkeiten und Verhaltenstendenzen der Beteiligten aus den Augen zu verlieren Hieraus ergeben sich vielfältige Schlussfolgerungen insbesondere für das institutionelle Design von Antimissbrauchsinstrumenten sowie für das Verständnis und die Anwendung von 42 AO

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