

CASE STUDY



Minimize Global Effective Tax Rate – Holding Company Structure UK and US

Industry: Financial Services



Our client and the task:

Shipleys LLP, an AGN member firm based in the UK, has a client, Spectra FX Solutions LLP (“Spectra”). Spectra specializes in providing advice, solutions and strategies on foreign exchange options. Shipleys LLP contacted AGN member Daszkal Bolton LLP in Florida to assist them on setting up as US Holding Company structure for Spectra. The US Holding Company structure was being implemented to provide for a more efficient global tax position for the Spectra group.

How we added value:

Daszkal Bolton LLP reviewed the proposed step plan provided by Shipleys on how the US Holding Company structure was going to be created and whether the steps were acceptable from a US tax perspective. Looking at the steps and the US tax rules, Daszkal Bolton made certain modifications, including US ‘check-the-box’ elections for certain entities in order to minimize the tax on the transfer and on a going forward basis.

What we did?

Daszkal Bolton LLP worked closely with Shipleys’ to make sure the restructuring of Spectra and the creation of a US Holding Company Structure was implemented in a tax efficient manner from both the US and UK perspective.

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