Index

AFL-CIO, 117
African Tax Administration Forum, 153
agency, 90
Australia, 104, 152, 157–8
Austria, 25, 63, 68
Bahamas, 22, 114
Bank of International Settlement, 62, 63
bank secrecy, 22, 99, 156
banking, 22–3
Barbados, 150
Barnett, Michael, 171
Belgium, 68, 150
beneficial ownership, 29–30
Bermuda, 23, 25
Blyth, Mark, 47
Boehner, John, 120
Botswana, 148
Braithwaite, John, 125, 160
Brazil, 11
Bretton Woods, 61, 112, 174
British Virgin Islands, 21, 23, 29
Brown, Prime Minister Gordon, 88, 103
Bush Administration, 71, 74, 98, 116
Campbell, John, 47, 60
capital mobility, 19
Caribbean Community, 153
Caribbean financial centres, 64, 104, 114, 151
Cayman Islands, 5, 23, 25, 114, 117, 150
Centre for Freedom and Prosperity, 71, 76, 115, 117, 118
change, interpretation of, 3
Channel Islands, 22, 23, 33, 129
charter companies, 17
Checkel, Jeffrey T., 46, 167
China, 11, 88, 124, 172
Christian Aid, 85
Citigroup, 29
Citizens for Tax Justice, 117
Clinton Administration, Qualified Intermediary Program, 114, 123
Coats, Alfred William, 44
Colander, David C., 44
collaboration problems, 2, 34, 41, 44, 111, 126, 141
Commonwealth Secretariat, 68, 76
constitutionalism, 84
constructivism, 46, 48
consultation, 75
Controlled Foreign Companies, 21–2, 24, 28, 32–3, 112
coordination problems, 44, 45, 74
corporate governance, 20–22, 29
and International Business Corporations, 31
and international tax planning, 21
and international taxation, 18
corporations, 17, 170
‘booking’ profitable transactions offshore, 21, 28, 30, 31
core control over the tax policy agenda, 135
exempt, 32–3
income, 17
International Business Corporations, 31–2
multinational, 19, 21, 174
opaque, 30–31
‘post-box’ companies, 32
status as legal persons, 18
structure of, 27–8, 32–3
subsidiary companies, 28–9
taxation of, 21, 119
Council of Europe, 153
Credit Suisse, 116, 131
critical junctures, 82
Democratic Party, 134
derivatives markets, 86, 87
developing countries, 19, 99, 172
administrative capacity, 153, 154
representation of, 101
taxing powers of, 101
technical assistance and training, 154
domestic politics, agenda-setting process in, 90
Double Tax Agreements, 19, 44, 69
double taxation, 18–20, 101
Downs, Anthony, 172
Drahos, Peter, 125
Drezner, Daniel, 42, 52, 135
Duvall, Raymond, 171
e-commerce, 26
economic globalisation, 19
economic regulation, political economy of, 171–2
Enron, 115, 116
EOI requests, 95, 152, 154–5
epistemic communities, 43
‘Eurodollar’ market, 22–3
European Competition Commissioner, 63–4
European Council of Finance Ministers, 64
European Court of Justice, 102
European Union, 63, 99, 153
Anti-Money Laundering Directive, 102
automatic information exchange of tax and banking information, 96
Code of Conduct on Business Taxation, 102
Common Consolidated Corporate Tax Base, 102
ECOFIN committee, 102
exempt corporations, 33
sovereignty in, 14
Savings Directive, 28, 97, 99, 102, 104, 129
tax information exchange, 101–2
‘Everyday Political Economy’ literature, 52
Financial Action Task Force, 25, 29
financial crisis, 1, 54, 60, 174
causes of, 168
coordination and implementation of the global response to, 86
and fiscal stimulus, 83, 119
and the future of global economic governance, 11
and the G20, 82–91, 86
and the Global Forum processes, 93
and global governance, 165
ideational conditions, 47, 48, 83
impact on norms and public sentiment, 119
impact on policy and regulatory priorities, 47
instrumental level, 83
and international tax cooperation, 8–10, 168
and neo-liberalism, 77
and offshore tax evasion, 158
policy responses to, 1, 61, 131
political pressure to resolve, 88
and the politics of international tax cooperation, 7–8, 81–110
scope and severity of, 83
structural economic impact, 83
and tax information exchange, 105
and tax regulation, 81
financial deregulation, 19
financial entrepreneurs, 23
financial liberalisation, 23, 61, 112, 168
financial regulation, and globalisation, 62
financial risk, 87
financial services industry, 7, 16, 22, 23, 28, 105, 144
‘Know Your Customer’ regulations, 29
and the OECD Harmful Tax Competition initiative, 67
self-regulation, 86
Financial Stability Board, 85, 87, 105, 151
Financial Stability Forum, 87, 102
fiscal contract, 4, 17
foreign exchange transactions, 62
forum shopping, 99
France, 63, 104, 124, 150–51, 152
free-riding, 141
The dynamics of global economic governance

G20, 1, 49, 134, 142, 153, 166, 167
conversion to a Leaders’ Forum, 50, 86
endorsement of the OECD standard for tax information exchange, 2, 88
Finance Ministers’ Forum, 87, 154
and the financial crisis, 82–91
and the Global Forum processes, 144
London declaration of 2009, 146
and the OECD, 50, 86–91, 169
outlook for, 172
political pressure on, 88
role of, 49, 50, 55
G20 Leaders’ Forum, 11, 83, 86, 90, 151, 160, 172
role of, 50, 77
G7, 12, 64, 65, 90
game theory, 43, 44
Geithner, Timothy, 117
Germany, 27, 63, 104, 124, 132, 133, 168
Gill, Stephen, 84
global economic governance, 11, 70, 174
dynamics of, 38–59
and the financial crisis, 165
implementation, 154, 158
and international tax cooperation, 171–5
literature of, 39
methodological foundations, 39–40
support of powerful states, 111
vertical disintegration of, 73
Global Financial Integrity, 26, 117
Global Forum on Transparency and Exchange of Information for Tax Purposes, 9, 70, 86–91, 92–9, 104–5
autonomy of, 146
capacity building, cooperation and compliance, 152–6
dynamics of, 38–59
and the financial crisis, 165
implementation, 154, 158
and international tax cooperation, 171–5
financial resources, 154
impact on taxpayer compliance behaviour, 156–8
implementation and effectiveness, 158
and improved compliance, 145, 151
influence on state behaviour, 144, 150–52
level playing field, 147
management approach to implementation and compliance, 148, 150
membership, 10, 146, 147, 148
and the OECD, 146
participation, 73, 145–6, 147
Peer Review Group, 146
peer review mechanism to assess compliance see separate entry
persuasion, incentives and sanctions, 143
preferential treatment of OECD member states, 147, 149
risk of non-compliance, 150
Steering Committee, 146
sustainability of, 172
Swiss compliance, 127
and trusts, 29
and the US FATCA, 124
Global Tax Forum, 70
globalisation and financial regulation, 62
foundations of, 83
and offshore financial centres, 61–3
Goldstein, Judith, 45
Gordon Report, 113, 114
Gordon, Richard, 113
Gourevitch, Peter, 51, 52, 114
governance, effective, 160
Greece, 84, 119
Guernsey, 23
Gurria, Angel, 89, 90
Haas, Ernst B., 43
Hall, Peter, 47
Healey, Denis, 20
hedging funds, 23, 86, 87
hegemonic stability theory, 41
hegemony, 70
Helleiner, Eric, 84
Henry, James, 26

Richard Eccleston - 9781849805988
Downloaded from Elgar Online at 02/28/2019 06:04:34AM
via free access
Index

Heritage Foundation, 98, 117
Hirschman, Albert O., 52
Hong Kong, 88
ideas, causal role of, 167
IMF, 49, 63, 82, 87, 99, 153
Fiscal Affairs Department, 62
and secrecy jurisdictions, 67
staff assessments of regulation
and transparency in secrecy
jurisdictions, 102
and tax information exchange, 102
India, 11
institutional adaptation, 49–50
institutional socialisation, 7, 90–91, 135
see also socialisation
institutionalisation, 2, 7
institutionalism, 86
liberal, 43, 44, 141, 167
punctuated evolution, 61
instrumentalism, 6, 150
intergovernmental organisations, 49, 87
interests, 47, 51, 77, 170
great-power interests, 52
international agreements, 45, 47, 167
international banking system, 82
international banks, 7, 17
International Business Corporations
ability to use bearer shares, 31
characteristics of, 31
International Chamber of Commerce,
25, 27
international community
benefits of cooperation, 34, 44, 90
commitment to transparency and
information exchange, 134, 146,
156, 159, 165, 174
and the financial crisis, 11, 131
international cooperation
causes of, 90
domestic politics of, 50–53
dynamic nature of, 45
impact of domestic politics on, 53
influences on, 40
rationalist approaches to, 3
sociological approaches to, 3
see also international tax
cooperation
international economy, and domestic
politics and policy priorities, 114
international finance, 17
international investment, 5, 7, 25, 65,
134
international organisations, 7, 38, 135
collection of international cooperation
and global governance, 46, 167, 169
coordination between, 153, 169
inter-organisational dynamics,
49–50, 88
and national policy preferences, 7
international practice, 5
international regimes, 38
compliance, 39, 45, 46, 111
and domestic politics, 170–71
effects of, 165–77, 170–71
effectiveness, 41, 52, 111, 143, 152
endogenous and exogenous
processes, 45, 48, 51
focal points in, 167
generative regimes, 43
ideas and regime dynamics, 167–8
implementation, 41, 143
institutions and inter-organisational
networks, 169–70
layered institutions of, 60
legitimacy of, 75
levels of analysis in, 54, 166
management approach to
implementation and
compliance, 143, 148, 150
negotiations and agreements within,
42
organisational level, 166
participation in, 41, 167
and political expectations, 167
revisionist theories of, 45
and self-interest, 43
as social institutions, 45
sociological approaches, 45–8
states’ political commitment to,
74
structural developments, 166
structural power, 170–71
and uncertainty, 42, 44
international relations, 40–45
‘American School’, 52
and domestic politics, 51
‘Everyday Political Economy’
literature, 52
The dynamics of global economic governance

liberalism, 11
neo-realism, 52
rationalism, 143
realist approaches, 6, 50, 90, 141
international system, 1
complex interdependence, 14, 42
credibility of and support for, 82
economic integration, 42
interdependence, 43
leadership in, 11
international tax competition, 2, 65, 66
international tax cooperation
barriers to, 33, 73–6, 173
benefits of, 74
dependence on the support of key states, 6, 73, 76
domestic politics of, 9, 111–40
effectiveness, 126
electoral support for, 168
and the financial crisis, 81–110
and the G20 Leader’s Forum, 172
problem of, 2
impact of international organisations on, 169
informal administrative cooperation, 155
and information asymmetry, 69
institutions, 172
intergovernmental commission on, 101
legal framework and willingness to comply, 154
politics of, 1, 4–8, 166, 174
sustainability of, 126, 165–77, 171–5
US resistance to, 118
international tax evasion, 1, 4, 15, 23–33, 144
commitment to end, 3, 60, 158
corporate structures and offshore evasion, 27–8
definition, 8
exempt corporations and exotic structures, 32–3
formula apportionment of tax liabilities, 173–4
growth of, 112
and information exchange, 16
information on the extent of, 63
International Business Corporations, 31–2
Liechtenstein banks, 130
measurement of, 8
non-disclosure of income or profits, 96
opaque corporations, 30–31
private banking and mass-marketed schemes, 25–7, 116
prosecutions for, 103
regulation of, 158
shelf entities and offshore subsidiaries, 28–9
strategies and significance, 23–33
Swiss banks, 127, 130
tax authorities’ knowledge about, 96
trust and foundations and establishing beneficial ownership, 29–30
international tax harmonisation, 65, 66
international tax policy, 114
international tax regime, 2, 17–23
barriers to implementation, 141
complexity of, 4, 7
conceptual foundations, 142–4
and corporate governance, 18
developments since the financial crisis, 8
and domestic political factors, 2, 115
effective implementation and ongoing compliance, 3
effectiveness, 8, 76, 125, 141–60
evolution of, 3, 9, 53
expert consensus, 48
and the financial crisis, 165
and financial interests of those who benefit from the status quo, 33, 38
governance problem of, 14
implementation, 141–64
institutional developments, 92
institutional structure of, 166
and international organisations, 38
level playing field, 147
and national interests, 38
path dependency in, 69
policy preferences of key states, 2
private banking and mass-marketed schemes, 25–7
problems and challenges for, 14–37
reform agenda, 4, 160
role of non-governmental actors, 7

Richard Eccleston - 9781849805988
Downloaded from Elgar Online at 02/28/2019 06:04:34AM via free access
<table>
<thead>
<tr>
<th>Index</th>
<th>183</th>
</tr>
</thead>
<tbody>
<tr>
<td>role of the US, 71, 121, 135</td>
<td>Monaco, 25</td>
</tr>
<tr>
<td>rules-based enforcement, 141</td>
<td>money laundering, 27, 102</td>
</tr>
<tr>
<td>and sovereignty, 18</td>
<td>Monti, Mario, 64</td>
</tr>
<tr>
<td>sovereignty-preserving nature of, 24, 33, 38, 142, 173</td>
<td>Moravcsik, Andrew, 52</td>
</tr>
<tr>
<td>state-centric nature of, 33</td>
<td>multilateral tax initiatives, 71</td>
</tr>
<tr>
<td>structural developments, 92</td>
<td>Murphy, Richard, 26, 149</td>
</tr>
<tr>
<td>support of powerful states, 88, 125, 166</td>
<td>neo-liberalism, 75, 83, 84</td>
</tr>
<tr>
<td>sustainability of, 3, 11, 76, 105, 125</td>
<td>Netherlands, 129</td>
</tr>
<tr>
<td>international trade and commerce, 17</td>
<td>networks, 44, 49–50, 91, 169</td>
</tr>
<tr>
<td>Italy, 84, 104, 119, 124</td>
<td>New Jersey, 18</td>
</tr>
<tr>
<td>Jersey, 5</td>
<td>non-governmental organisations, 26, 85, 99, 142, 166</td>
</tr>
<tr>
<td>Joachim, Jutta, 143</td>
<td>norms, 75</td>
</tr>
<tr>
<td>Joint International Tax Shelter</td>
<td>construction and dissemination of new, 48</td>
</tr>
<tr>
<td>Information Centre, 26</td>
<td>embedded, 47</td>
</tr>
<tr>
<td>jurisdiction over economic transactions, 24</td>
<td>neo-liberal, 69</td>
</tr>
<tr>
<td>‘Know Your Customer’ regulations, 29</td>
<td>political implications of, 77</td>
</tr>
<tr>
<td>Krasner, Stephen, 40, 42</td>
<td>Nye, Joseph, 14, 42, 54</td>
</tr>
<tr>
<td>leadership, 41, 45, 70</td>
<td>O’Neil, Paul, 71–2</td>
</tr>
<tr>
<td>and crises, 82</td>
<td>Obama Administration, 117, 118–22, 125, 168</td>
</tr>
<tr>
<td>international, 54</td>
<td>Obama, Barack, 84, 88, 117, 122, 134, 168</td>
</tr>
<tr>
<td>non-hegemonic, 41</td>
<td>Occupy Wall Street movement, 53, 119</td>
</tr>
<tr>
<td>League of Nations, 25, 100, 112, 127</td>
<td>OECD, 7, 29, 104, 166, 172</td>
</tr>
<tr>
<td>Fiscal Committee, 7</td>
<td>achievements of, 91, 141</td>
</tr>
<tr>
<td>Levi, Margaret, 173</td>
<td>agenda-setting role, 9, 81, 87, 169</td>
</tr>
<tr>
<td>Levin, Senator Carl, 116, 117</td>
<td>automatic information exchange, 98–9</td>
</tr>
<tr>
<td>Liechtenstein, 25, 30, 63, 129</td>
<td>brokerage role, 90</td>
</tr>
<tr>
<td>Liechtenstein Disclosure Facility, 157</td>
<td>Business Industry Advisory Council, 67, 153</td>
</tr>
<tr>
<td>Liechtenstein-LGT affair, 27, 96, 104, 156</td>
<td>Centre for Tax Policy and Administration, 89</td>
</tr>
<tr>
<td>Luxembourg, 5, 22, 25, 68, 129</td>
<td>Committee on Fiscal Affairs, 68</td>
</tr>
<tr>
<td>and the OECD Harmful Tax Competition initiative, 67, 68, 75, 145</td>
<td>contribution to global governance, 43</td>
</tr>
<tr>
<td>Macao, 88</td>
<td>dependence on US funding, 71</td>
</tr>
<tr>
<td>Marcos family, 30</td>
<td>expertise of, 50</td>
</tr>
<tr>
<td>mercantilism, 11, 121, 175</td>
<td>financial resources, 154</td>
</tr>
<tr>
<td>mobility of capital, 22, 62</td>
<td>Forum on Harmful Tax Practices, 75</td>
</tr>
<tr>
<td>and the G20, 49, 50, 86–91, 169</td>
<td>Forum on Tax Administration, 120</td>
</tr>
<tr>
<td>and the Global Forum processes, 146</td>
<td></td>
</tr>
</tbody>
</table>
identification of regulatory focal points, 44
Improving Access to Bank Information for Tax Purposes, 96–7
legitimacy and authority of, 50
Model Agreement on Exchange of Information on Tax Matters, 69, 96, 97
Model Tax Agreement, 97
Model Tax Convention, 69, 81, 98, 131, 132
model treaty, 44
Revised Standard Magnetic Format for Automatic Information Exchange, 97, 99
secretarial support for the Global Forum, 146
Secretary General, 88, 89, 90
Special Sessions on Tax Competition, 64
tax information exchange standard, 144, 150, 152, 158, 159
and the United Nations, 101
OECD–EU Multilateral Convention on Mutual Administrative Assistance in Tax Matters, 96, 114, 153
OECD Harmful Tax Competition initiative, 9, 20, 38, 50, 142
aim to level the playing field, 67, 68
and the Bush Administration, 74
campaign against, 71, 76
criticism of, 145
dual mandate of, 65
globalisation and the threat of offshore financial centres, 61–3
hypocrisy, 67, 75
identification of Preferential Tax Regimes, 65
identification of tax havens, 65
as incremental reform, 68–70
ineffectiveness, 41, 60–80
international response to the threat of, 63–73
legitimacy of, 145
peer review assessments, 66, 92, 151
politics without conviction, 72–3
responses to the 1998 report, 66–8
and small states, 70
and the United States, 70–72
Offshore Financial Centres, 16, 25, 86, 98, 118
growth of, 22–3, 64
international response to the threat of, 63–73
Olenicoff, Igor, 27
Open Economy Politics, 43
Owens, Jeffrey, 89, 90
Palan, Ronen, 20, 24, 62, 73
Panama, 21, 23, 25, 148, 150
paradigm shift, 83, 168
peer review mechanism to assess compliance (Global Forum), 32, 92, 99, 126, 144–58
assessment of the process, 144–58
effect of a negative assessment, 150
criteria for reviews, 94, 95
effectiveness of the process, 145, 149, 156
integrity and rigour of the peer review process, 148–50, 173
legitimacy of the process, 77, 147, 172
peer review regime, 10, 32, 148
Phase 1 Peer Review, 132, 143, 145, 146, 148, 149, 151, 159
Phase 2 field-based assessment regime, 92, 94, 143, 145, 146, 148, 159
threshold of 12 TIEAs, 94
use of assessments by national governments, 150
Pew Research, 119
policy entrepreneurs, 48, 90
policy paradigms, 47, 168
policy windows, 90, 121
political change, impediments to, 65
Polyani, Karl, 53
Portugal, 84, 119
power, 19, 45, 51, 66, 70, 75, 89, 90
hegemonic, 41, 66, 70
structural, 33, 52, 76, 111, 121, 125, 134–5, 166, 170–71
preferential tax regimes, 5, 65, 66
Prisoner’s Dilemma, 44, 74, 141
protectionism, 126, 175
Public Citizen, 117
public sentiments, 47, 48
Putnam, Robert D., 52
Qatar, 150
Radaelli, Claudio M., 14
ratings agencies, regulation of, 87
rationalism, 3
regime change, 3, 38
and the domestic politics of international cooperation, 50–53
dynamics of, 61, 166–71
leadership, 41
liberal approaches, 40, 42, 42–4, 45
networks and inter-organisational dynamics, 40–50
realist approaches, 40, 41, 42
research agenda, 53–5
synthetic interpretation of, 39
systemic theories of, 40–45, 51
theories of, 39, 45–53, 171
regime effectiveness, and regime compliance, 10
regime sustainability, 11–12
regulation, 2, 18, 38, 84, 172
‘double game’ in, 125–6
reinsurance services, 23
Republican Party, 120, 125
research, ideographic, 73
Rixen, Thomas, 19, 69, 73–4, 173
Rumsfeld, Donald, 96
Russia, 11
Sachs, Jeffrey, 11
San Marino, 150
Scharpf, Fritz, 152
Scott, James, 75
secrecy jurisdictions, 4, 16, 26, 85, 87, 111
and compliance, 50
and corporate governance, 31
definition, 5, 20
dependence on financial services, 6
disclosure of tax information, 29
domestic politics of international taxation, 126
and the Global Forum processes, 147, 152
a global governance problem, 5
impact on economic welfare, 22
and international tax evasion, 24
and the OECD Harmful Tax Competition initiative, 38, 66, 67, 71, 98, 101
offshore, 34
regulatory frameworks, 20, 118
review of by US government, 113
role in the global financial system, 63, 118
severance of connecting factors, 24
sovereignty of, 28
and tax information exchange, 11, 72
and terrorist financing, 27
trusts, 29
Sharman, Jason, 66, 75
Shaxon, Nicholas, 133, 142
Single European Act, 61
Slaughter, Anne-Marie, 49
social learning, 43
socialisation, 46, 48, 90–91
_Type 1_ socialisation, 46 167, 169
_Type 2_ socialisation, 46, 167
sociological traditions on international cooperation, 3, 141, 143, 150
South Sea Bubble, 17
sovereign debt crisis, 82, 119, 133
sovereignty, 173
commercialisation of, 62
fiscal, 34
and the international tax regime, 24, 33, 38, 142, 173
overlapping, 42
sovereign right to tax and spend, 2, 33
Spain, 84, 119, 124
Special Purpose Entities, 23
Stiglitz Commission, 99
Stone, Deborah, 47
Strange, Susan, 62
subsidiary companies, 28–9
Swiss Bank Corporation, 130
Swiss Bankers Association, 132
Swiss People’s Party, 131
Switzerland, 22, 26, 63, 68, 153
bank secrecy, 9, 25, 129, 132
banking industry, 112, 127, 134–5
bilateral treaties, 132, 133, 135
domestic political constraints, 127, 131–2
domestic politics of international taxation, 126–34
evolution of the banking industry, 127
and the financial crisis, 129–31
foreign funds held in Swiss banks, 128
and the Global Forum processes, 155
membership of the OECD, 127
and the OECD Harmful Tax Competition initiative, 6, 67, 68, 75, 129, 131, 145, 155
and the OECD Model Convention, 131
Swiss Banking Act, 25, 127
threat to tax enforcement, 129
UBS, 129–31
withholding tax, 129, 133
tax avoidance, 3, 24, 31, 60, 62, 119, 126
tax competition, 32, 65, 66
tax compliance, 84, 152, 157, 158
and deterrence, 26
and exempt corporations, 32
and International Business Corporations, 32
promotion of, 26
tax evasion see international tax evasion
tax havens, 4, 23, 65, 144
definition, 5, 15, 68
tax information exchange, 1, 3, 4, 60, 70, 81, 96, 135, 167
automatic, 10, 97, 98, 102
developments beyond the Global Forum, 99–104
and the European Union, 101–2
and the IMF, 102–3
improvement in, 158, 159
level playing field, 67, 68, 126
opposition to, 72
political resistance to automatic exchange, 98
on request, 94, 96, 97, 98
scope and effectiveness of provisions on, 156
sustainability of activity on, 104–5
unilateral measures, 103–4
and the US, 122
and the World Bank Group, 102–3
Tax Information Exchange Agreements, 10, 72, 97, 99, 100, 123, 154, 155
effectiveness, 72
and secrecy jurisdictions, 104
threshold of twelve, 92, 94
tax justice activism, 142, 166, 174
Tax Justice Network, 16, 26, 76, 85, 117, 149
tax minimisation, lawful, 20, 24, 25, 28, 31
tax planning, 23, 26, 29, 31, 62, 144
and corporate governance standards, 21
entrepreneurial, 4
legitimacy of corporate actors in, 85
tax risk, 24
tax transparency, 1, 4, 6, 60, 76, 81, 87, 91–9
and the G20, 87–8, 144
and the IMF, 102
improvement in, 15, 104, 156, 159, 174
international commitment to, 72, 160
and international tax evasion, 16
political resolve to enhance, 85
and the Revised Global Forum, 92–9
Switzerland and, 68, 133
taxation of corporations, 21
double taxation, 18
enforcement of, 20
formula apportionment of tax liabilities, 173–4
political economy of, 91
residency principle, 18, 19
source principle, 18, 19
tax credits, 19
withholding tax, 19
Tax Justice activism, 142
Tea Party, 120, 125
terrorist financing, 27, 72
Tobin tax, 84
transfer pricing, 24
transgovernmental networks, 43
transnational business and finance, 112
transnational production, 19
trusts and foundations, 29–30

Richard Eccleston - 9781849805998
Downloaded from Elgar Online at 02/28/2019 06:04:34AM via free access
Index

UBS, 26, 27, 96, 103–4, 116, 129–31, 134, 156
 expansion into the US market, 130
 offer of bank secrecy to US citizens, 130
 Ugland House, 117
 Uncut, 76, 85
 Underdal, Arild, 155, 170
 United Kingdom, 27, 124, 132, 151, 157
 abolition of withholding taxes, 114
 acts of incorporation, 17
 Crown Dependencies, 104
 deficit, 84, 119
 finance ministry, 133
 and the Global Forum processes, 168
 ‘Hartnett Scandal’, 104
 prosecution of cases of international
 tax evasion, 103
 reluctance to regulate secrecy
 jurisdictions, 113
 and Swiss banks, 133
 United Nations, 153
 Commission of Experts on the
 Reform of the International
 Monetary and Financial
 System, 99
 Committee of Experts on
 International Cooperation in
 Tax Matters, 100–101
 Economic and Social Council, 101
 Fiscal Committee, 100–101
 and the OECD, 101
 Tax Committee, 99
 United States, 7, 12, 104, 157
 acts of incorporation, 17
 arguments against international tax
 cooperation, 118
 Budget Control Act, 120
 budget deficits, 84, 119, 120
 Bush Administration, 71
 Congressional Super Committee,
 120
 Controlled Foreign Companies, 21–2
 corporate interests, 125
 Council for International Business,
 27–8
 debt ceiling crisis, 120
 declining power, 41, 172
 Democratic Party, 134
 Dodd-Frank Wall Street Reform
 Act, 121
 domestic politics of international
 taxation, 112–26
 ‘double game’ in regulation, 125–6
 End Tax Haven Abuse Act, 117
 extraterritorial tax enforcement, 122,
 123
 Foreign Account Tax Compliance
 Act, 103, 120, 122–5
 and the Global Forum processes, 168
 Government Accountability Office,
 21, 29, 119
 integrity of its tax system, 113
 International Money Laundering
 Abatement and Anti-Terrorist
 Financing Act, 116
 international tax policy, 124
 international taxation as a domestic
 political issue, 115–17
 IRS Gordon Report, 113, 114
 Justice Department, 130
 leadership role, 111, 112, 125, 174
 need for information on its citizens’
 offshore investments, 113, 115,
 118, 122–3
 need to attract foreign investment,
 134
 and the OECD Harmful Tax
 Competition initiative, 38,
 70–72
 Offshore Voluntary Disclosure
 Initiative, 158
 Patriot Act, 116
 policy on tax haven abuse, 115
 politicisation of financial policies,
 119
 President’s National Commission
 on Fiscal Responsibility and
 Reform, 120
 prosecution of cases of international
 tax evasion, 103–4
 protectionism, 126
 public interest groups promoting tax
 justice, 117
 public opinion on offshore tax
 evasion, 118–19
 Qualified Intermediary Program,
 114, 123
 Reagan Administration, 113

Richard Eccleston - 9781849805988
Downloaded from Elgar Online at 02/28/2019 06:04:34AM
via free access
Republican Party, 120, 125
role of, 174
Senate Banking Committee, 116
Senate Permanent Subcommittee on
Investigations, 115, 116, 118, 130
Stop Tax Haven Abuse Act 2006, 9,
84–5, 117
tax concessions, 112
and tax information exchange, 122,
126
tax policy community, 114
Tea Party, 120, 125
treaty and TIEA network, 123
and UBS, 130–31
Unemployment Compensation
Extension Act, 122
unilateral approach to international
tax policy, 112, 121, 125–6
Voluntary Disclosure Schemes, 27,
121
withholding tax, 123
US Foreign Account Tax Compliance
Act, 122–5, 134, 135
features of, 122–3
impact and effectiveness, 122
intergovernmental agreement on
expanding, 124
opposition to, 124
political risks associated with, 123,
124
requirement for financial institutions
to provide tax and financial
information, 123
structure and rationale of, 125–6
values, internalisation of, 46
Vanuatu, 152
Vogel, David, 170
Voluntary Disclosure Schemes, 27, 104,
121, 156, 157, 158, 160
Wade, Robert, 11
Webb, Michael, 70
Weil, Raoul, 116
welfare state, 25
withholding tax, 19
Woodward, Richard, 68
World Bank, and secrecy jurisdictions,
67
World Bank Group, 102, 103,
153
World Economic Forum, 150
World Trade Organization, 69
Young, Oran, 40, 143