# Unveiling the Secrets of Ireland's Tax Haven: An In-Depth Look into Kieran Allen's Tax Avoidance Schemes

In the realm of international tax law, Ireland has emerged as a prominent player, attracting multinational corporations with its alluring tax incentives. However, the country's reputation as a tax haven has come under scrutiny due to the controversial tax avoidance strategies employed by some corporations, facilitated by the mastermind behind many of these schemes: Kieran Allen. This article delves into the intricate world of Irish tax havens, examining the methods, controversies, and consequences surrounding Allen's tax avoidance schemes.



#### The Rise of Ireland's Tax Haven

Ireland's transformation into a tax haven began in the 1990s, driven by the government's desire to attract foreign investment and stimulate economic growth. The of a 12.5% corporate tax rate, significantly lower than the

prevailing rates in other developed countries, proved to be a potent magnet for multinational corporations seeking to reduce their tax liabilities.

#### Kieran Allen: The Man Behind the Schemes

Kieran Allen, a Dublin-based tax consultant, emerged as a central figure in Ireland's tax haven industry. Known for his innovative tax avoidance strategies, Allen played a pivotal role in designing and implementing complex tax structures that allowed multinational corporations to minimize their global tax burden.

### The Double Irish and the Malta Sandwich

Among Allen's most famous tax avoidance schemes are the "Double Irish" and the "Malta Sandwich." The Double Irish involved establishing two Irish subsidiaries, one resident in Ireland and the other in a low-tax jurisdiction. The Irish subsidiary would license intellectual property to the non-resident subsidiary, which would then pay royalties back to the Irish parent company, effectively shielding the income from higher taxes elsewhere.

The Malta Sandwich, a more complex structure, involved a Maltese company interposed between the Irish parent company and the nonresident subsidiary. The Maltese company, benefiting from Malta's favorable tax treaty with Ireland, would receive royalties from the nonresident subsidiary and pay dividends to the Irish parent company, further reducing the overall tax liability.

#### **Controversies and Criticism**

Allen's tax avoidance schemes have sparked widespread controversy and criticism. Detractors argue that these schemes exploit loopholes in tax laws, depriving governments of much-needed tax revenue. They contend

that allowing multinational corporations to minimize their tax obligations undermines the fairness and integrity of the international tax system.

#### **International Pressure and Anti-Avoidance Measures**

The widespread use of tax havens and tax avoidance strategies like those employed by Allen drew the attention of international organizations such as the OECD (Organization for Economic Cooperation and Development). In response, the OECD developed the BEPS (Base Erosion and Profit Shifting) initiative, a comprehensive set of anti-avoidance measures designed to combat tax avoidance practices.

#### **Consequences and Reforms**

The international pressure and scrutiny forced Ireland to re-evaluate its tax policies. The Irish government introduced several reforms, including the abolition of the Double Irish structure and the tightening of tax loopholes. However, Ireland still remains an attractive location for multinational corporations due to its relatively low corporate tax rate and its extensive network of tax treaties.

Ireland's tax haven status has been shaped by the ingenuity of tax consultants like Kieran Allen, who devised intricate tax avoidance schemes that exploited loopholes in international tax laws. While these schemes have allowed multinational corporations to minimize their tax liabilities, they have also sparked controversies and prompted international efforts to combat tax avoidance. Ireland has implemented reforms in response to international pressure, but the country continues to navigate the complex world of international tax law, balancing its economic interests with the need for fairness and transparency.



#### Tax Haven Ireland by Kieran Allen

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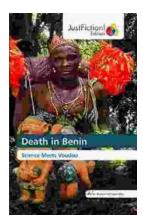


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