
The Offshore Tax Planning Review

A NOTE ON GÉROLSTEIN

Robert Venables QC¹

In my article in Volume 4, Issue 1, page 1, on "The UK Charity & Double Taxation Treaties", I referred to "Gérolsteins". "What," correspondents have asked, "is a Gérolstein?"

La Grande-Duchesse de Gérolstein is a comic opera written by Jacques Offenbach for the Paris Exhibition of 1867. Offenbach's operettas may be compared, favourably, to those of Gilbert & Sullivan. He is perhaps best known in England for *Orpheus in the Underworld* or, at least, its famous cancan.

La Grande-Duchesse de Gérolstein takes place in pre-Revolutionary times in the mythical Grand-Duchy of Gérolstein, a tin-pot inconsequential state presided over by the Grand-Duchess. The Grand-Duchess personally promotes Fritz, a handsome young recruit to her army, to corporal, lieutenant and then captain, *en route*, she hopes, to the Grand-Ducal bed. Gérolstein can thus hardly be termed a model state.

The original Gérolstein happened to be located somewhere in German-speaking Europe. Readers will appreciate that nowadays these tiny sovereign states where regulation is non-existent and no questions are asked are more likely to be located on some far-flung atoll than in some European enclave where the writ of the EC does not run.

¹ Robert Venables QC, 24 Old Buildings, Lincoln's Inn, London WC2A 3UJ.
Tel: (071) 242 2744 Fax (071) 831 8095
Consulting Editor of this *Review*.