

$$\Gamma_{EK} = \Gamma_{FK} = 7,3625\%$$

FA

$$S^d = S^A \cdot (1 + s^{0,2})$$

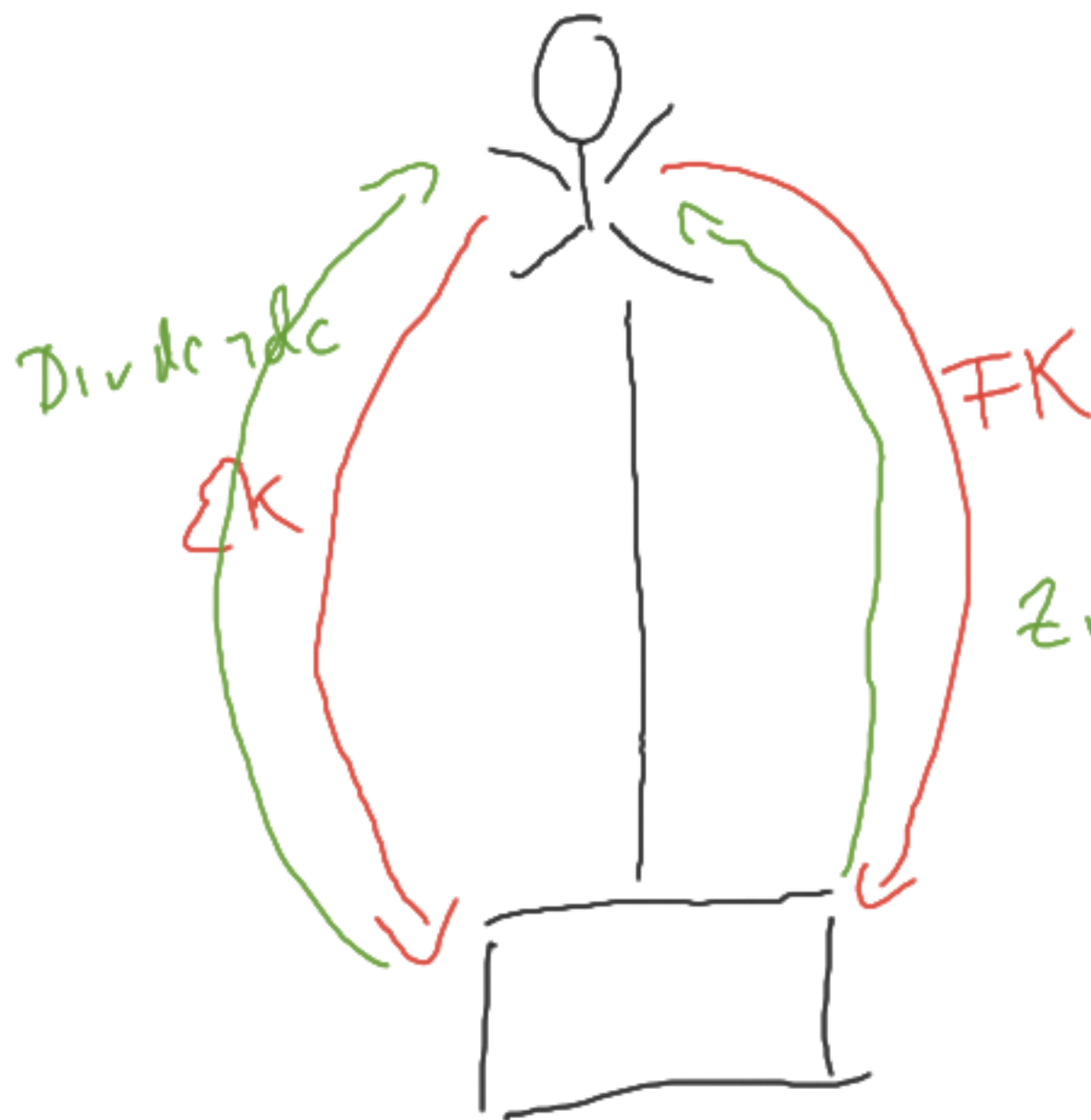
2,6375%

$C_{CR} = 10\%$

Ges KSt / Solz

4,25008%

FA



EK

FK

Dividende

Zinsen

$r_{EK}$

Gewinn vor Steuern

14,25008%

$r_{FK}$

10%

Ges KSt / Solz

FA

2,6375% FA

$$S^z = S^A \cdot (1 + s^{0,2})$$

$C_{FK} = 10\%$

$i_{EK}$  Dividende  $X$ !

$$\frac{1 \cdot s^A \cdot (1 + s^{0,2}) \cdot X}{= r_{EK} \quad 7,3625\%}$$

$$i_{EK} - i_{EK} \cdot (s^A \cdot (1 + s^{0,2})) = r_{EK}$$

$$i_{EK} (1 - s^A (1 + s^{0,2})) = r_{EK}$$

$$i_{EK} = \frac{r_{EK}}{(1 - s^A (1 + s^{0,2}))} = 10\%$$

$i_{FK}$  Zinsen  $X$ !

$$\frac{1 \cdot s^A \cdot (1 + s^{0,2}) \cdot X}{= r_{FK} \quad 7,3625\%}$$

$$i_{FK} - i_{FK} (s^A (1 + s^{0,2})) = r_{FK}$$

$$i_{FK} (1 - s^A (1 + s^{0,2})) = r_{FK}$$

$$i_{FK} = \frac{r_{FK}}{(1 - s^A (1 + s^{0,2}))} = 10\%$$

$$d_{EK} = \dot{c}_{EK} + r_{EK} \cdot s^G + r_{EK} \cdot s^2 (1 + s^{0,2})$$

$$\underline{d}_{EK} = \underline{\dot{c}}_{EK} + r_{EK} \cdot s^G + r_{EK} \cdot s^K \Rightarrow \dot{c}_{EK} = 10\%$$

$$r_{EK} = ?$$

$$r_{EK} - r_{EK} \cdot s^G - r_{EK} \cdot s^2 = \dot{c}_{EK}$$

$$r_{EK} (1 - s^G - s^2) = \dot{c}_{EK}$$

$$r_{EK} = \frac{\dot{c}_{EK} \text{ — } 10\%}{(1 - s^G - s^2)} = 14,25008\%$$

$$\begin{array}{cc} / & \backslash \\ 14\% & 15,825\% \end{array}$$

Kapital <sup>4</sup>überlassung 100.000 €

$$d_{EK} = 14,25008\%$$

Gewinn vor Steuern 14.250,08 €

·/· KSt

- 2.137,51 €

·/· SolZ

- 117,56 €

·/· GewSt

- 1998,01 €

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Gewinn nach Steuern

10.000 €

⇒ Dividende

$$R_{FK} = C_{FK} + S^G (R_{FK} - c) + S^2 (R - c)$$

$$R_{FK} = C_{FK} + S^G R_{FK} - S^G c + S^2 R - S^2 C_{FK}$$

$$R_{FK} - S^G R_{FK} - S^2 R_{FK} = C_{FK} - S^G C_{FK} - S^2 C_{FK}$$

$$R_{FK} (1 - S^G - S^2) = C_{FK} \cdot (1 - S^G - S^2) / (1 - S^G - S^2)$$

$$R_{FK} = C_{FK}$$

$$C_{FK} = 10\%$$

$$\hookrightarrow R_{FK} = 10\%$$

$$d_{FK} = c_{FK} + s^2 (L_{FK} - c_{FK}) + s^G (R_{FK} - \dot{c}_{FK} + 0,25 \dot{c}_{FK})$$

$$d_{FK} = \dot{c}_{FK} + s^2 (L_{FK} - c_{FK}) + s^G (R_{FK} - 0,75 \dot{c}_{FK})$$

$$R_{FK} = \dot{c}_{FK} + s^2 L_{FK} - s^2 c_{FK} + s^G d_{FK} - s^G 0,75 \dot{c}_{FK}$$

$$R_{FK} - s^2 L_{FK} - s^G d_{FK} = \dot{c}_{FK} - s^2 c_{FK} - s^G 0,75 \dot{c}_{FK}$$

$$R_{FK} (1 - s^2 - s^G) = \dot{c}_{FK} (1 - s^2 - 0,75 s^G)$$

$$d_{FK} = \frac{\dot{c}_{FK}}{(1 - s^2 - s^G)} \cdot (1 - s^2 - 0,75 s^G)$$

$\underbrace{\hspace{10em}}_{15,825\%}$ 
 $\underbrace{\hspace{10em}}_{14\%}$ 
 $\underbrace{\hspace{10em}}_{15,825\%}$ 
 $\underbrace{\hspace{10em}}_{14,00\%}$

$$d_2 = 10,49875\%$$



Kapitalückerschlag

$i_{FK} = 10\%$

100.000

10.000

$d_{FK} = 10,49875\%$

Gewinn v. Steuern  
und Zinsen

10.498,75

/. ZINSEN

- 10.000,00

Gewinn v. Steuern

498,75

/. KSt

- 74,81

/. Solz

- 4,11

/. GewSt

- 419,83

Gewinn nach  
Steuern

0

Gewinn vor Steuer - u-d Zinsen	10.498,75
· 1. Zinsen	10.000,00
+ § 8 Nr. 1 GewStG	2.500,00
= Gewerbesteuer	2998,75
× § 8	<u><u>419,83</u></u>



$$\lambda_{EK} = \frac{\dot{C}_{EK}}{(1 - s^G - s^K)}$$

$$-\dot{\lambda}_{FK} = \frac{\dot{C}_{FK}}{(1 - s^G - s^K)} \cdot (1 - s^2 - 0,75 s^G)$$

Wenn  $\dot{C}_{EK} = \dot{C}_{FK}$

$$\lambda_{FK} = \lambda_{EK} \cdot (1 - s^2 - 0,75 s^G)$$

$$\hookrightarrow \lambda_{EK} > \lambda_{FK}$$

weil

$$(1 - s^2 - 0,75 s^G) < 1$$

$$\cancel{(1 - s^2 - 0,75 s^G)} \Rightarrow 1$$

$$\dot{C}_{EK}$$



$$\dot{C}_{FK}$$

$$\dot{C}_{EK} \cdot (1 - s^a) = r_{EK}$$

$$\dot{C}_{FK} \cdot (1 - s^z) = r_{FK}$$

gegeben ist unser

nach dem erwerbssteuersatz für den  $r$

$$r_{EK} = r_{FK}$$

$$\dot{C}_{EK} = \frac{r_{EK}}{(1 - s^a)}$$

$$\dot{C}_{FK} = \frac{r_{FK}}{(1 - s^z)}$$

$$C_{EK} = \frac{r_{EK}}{(1-s^d)}$$

PV

$$C_{FK} = \frac{r_{FK}}{(1-s^Z)}$$

PV

I  $s^d = s^Z \Rightarrow$  Abgeltungssteuer  $s^A (1+s^{Solz})$

II

$$s^d = s^A (1+s^{Solz}) \rightarrow s^Z = s^E (1+s^{Solz})$$

$$s^d = 0,16 \cdot s^E (1+s^{Solz}) \rightarrow s^Z = s^E (1+s^{Solz}) / >10\%$$

III

$$s^d = s^A (1+s^{Solz}) \rightarrow s^Z = s^A (1+s^{Solz})$$

$$s^d = 0,16 \cdot s^E (1+s^{Solz})$$

10% <

$D_{\text{ca}} > 15\%$

$$\begin{array}{c} \text{DL} \\ S^1 \\ 0,6 \cdot S^E (1 + S^{0,2}) \end{array}$$

$$\begin{array}{c} \text{DL} \\ S^2 \\ S^E + S^E (1 + S^{0,2}) - \text{Min}(K_H, K_Y (1 + S^{0,2})) \end{array}$$

$$S^{ER} = 30\%$$

$$S^{ER} = S^G + \frac{S^2 (1 + S^{0.2})}{15,825\%}$$

$$15,825\%$$

$$30\% = S^G + 15,825\%$$

$$S^G = 30\% - 15,825\% = 14,175\%$$

$$S^G = 14,175\% = \mu \cdot H$$

$$14,175\% = 3,5\% \cdot H$$

$$H = 405\%$$

