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CHAPTER 24 TAXATION OF INTERNATIONAL TRANSACTIONS SOLUTIONS TO PROBLEM MATERIALS. Examples 12 and 24 Partin earned net foreign source income for the year of \$10,000. Partin incurred a loss of \$50,000 in the general limitation basket and profits of \$60,000 in the financial services income basket.

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Taxation of International Transactions 24-5. organizations, trades or businesses owned or controlled directly or indirectly by the same interests. This can be done whenever the IRS determines that reallocation is necessary to prevent the evasion of taxes or to reflect income more clearly. pp. 24-10 and 24-11 5.

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The tax is levied on net taxable income, which consists of gross income less allowable business deductions. The net taxable income is subject to graduated tax rates ranging from 15 to 35 percent. Bilateral income tax treaties play an important role in the taxation of international transactions.

FEDERAL TAXATION OF INTERNATIONAL TRANSACTIONS

Sections 861-865 and the regulations thereunder provide specific rules for sourcing different types of income. These rules provide a basis for sourcing interest, dividends, rents, royalties, personal

services income, transportation income, space and ocean income, inventory sales, and international communication income.

CHAPTER 9

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TAXATION OF INTERNATIONAL TRADE AND INVESTMENT

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