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Income tax treaties reduce the rate of withholding. p. 25-6 2. Generally, dividends paid by a foreign corporation are foreign-source income. Certain exceptions apply, however, when the dividends are paid by the U.S. branch of a foreign corporation where 25% or more of the foreign corporation's gross income for the prior three years is effectively connected with a U.S. business.

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FEDERAL TAXATION OF INTERNATIONAL TRANSACTIONS 10.2.3 Source of Income. U.S. tax law classifies all income into one of two categories—U.S. source and foreign source income. In general, a foreign company's U.S. source income is subject to U.S. tax, while its foreign source income is exempt.

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International tax systems Territorial - no tax is generally due on income earned outside of the country in which the parent is located Worldwide - all income is subject to taxation by the country ... "Arm's-Length" related party transactions Business purpose 15.518 Fall 2002 Session 14 . Worldwide Taxation

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