



section 951a - global intangible low-taxed income (gilti) *webinar*

April 24, 2018

Charles Kolstad will be speaking via webinar on, "Section 951A - Global Intangible Low-Taxed Income (GILTI)." This webinar will be held on Tuesday, April 24, 2018.

This webinar will provide an overview of International Tax Law Changes in the Tax Cuts and Jobs Act of 2017.

- Territorial Tax System vs. World-Wide Tax System
- Foreign Dividends Received Deduction
- Taxation of Pre-2018 Accumulated Earnings

New Section 951A

- New Category of Subpart F Income
- Offshore Transfer of US Developed Intangibles
- Computation of GILTI Inclusion
- Computation of Business Asset Investment

GILTI Deduction; Foreign Tax Credits

- Who Can Claim the Deduction?
- Foreign Tax Credit Computations
- Separate GILTI Basket Under Section 904

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practice areas

corporate & business transactions

tax and trusts & estates

transactional tax