



Year-End Tax Planning to Reduce Global Intangible Low-Taxed Income

<https://www.youtube.com/watch?v=vBqYH4dpoal>

Taxpayers can reduce the impact of GILTI from a non-treaty country by contributing the CFC to C corporation before the end of the year. My attached video illustrates that the popular 962 election isn't as effective if the CFC is in a non-treaty country.

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