



# 2022 Annual Conference

## Recent Captive Tax Developments, Concerns, and Trends

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# State and Local Income Taxes

- UNITARY FILING
- TOTAL INCLUSION
- INCLUSION BASED ON PERCENTAGE OF UNDERWRITING INCOME
- OTHER



# RESERVE MECHANICAL, INC.

- RESULT
- INCLUSION OF INCOME BY CAPTIVE



# CIC SERVICES, INC.

- THE NET RESULT



# D&O AND EMPLOYEE BENEFITS

- DELAWARE ENACTMENT OF D&O CAPTIVE LEGISLATION / DPT?
- EMPLOYEE BENEFITS IN CAPTIVES
  - EFFECT OF UNRELATED BUSINESS
  - A DOUBLE EDGED SWORD





# PASSIVE FOREIGN INVESTMENT COMPANIES

- CONTROLLED FOREIGN CORPORATION (CFC)/US SHAREHOLDER “KICK OUT”
- NON CFC/CFC US PERSON, NON-US SHAREHOLDER
- RELATED PERSON INSURANCE INCOME CAPTIVE
- PROPOSED EMPLOYEE REQUIREMENT
- ELECTION UNDER IRC SECTION 953 (d)



# Q&A SESSION



# THANK YOU!