



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 SWARD



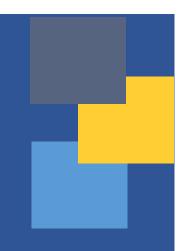


PASSIVE FOREIGN INVESTMENT COMPANIES

- 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!

