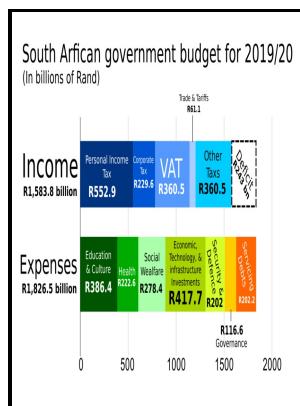


International tax relations

Faculty of Law, University of Toronto] - Testimony of Treasury International Tax Counsel John Harrington Before the Senate Committee on Foreign Relations on Pending Income Tax Agreements



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It abolished this practice in a new revenue code in 1997, effective 1998. After 2025, the GILTI tax rate increases to 62. Further, the rate of withholding may vary by type of income or type of recipient.

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Nonresident citizens who do not satisfy these exceptions are taxed in the same manner as residents, at a flat rate of 15% on worldwide income, in addition to mandatory contributions of up to 18.

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Yes Yes No Residence-based taxation. Washington, DC: Joint Committee on Taxation. Preventing this exploitation of our tax treaties is critical to ensuring that the third country will sit down at the table with us to negotiate on a reciprocal basis, so that we can secure for U.

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