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section 965 requires united states shareholders as defined under section 951 b to pay a transition tax on the untaxed foreign earnings of certain specified foreign corporations as if those earnings had

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i r c 965 b reduction in amounts included in gross income of united states shareholders of specified foreign corporations with deficits in earnings and profits

section 965 requires united states shareholders as defined under section 951 b to pay

a transition tax on the untaxed foreign earnings of certain specified foreign corporations as if those earnings had

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mar 31 2026 form 965 a is used by individual taxpayers and entities taxed like individuals to report a taxpayer s net 965 liability for each tax year in which a taxpayer must account for section 965 amounts

the instructions for these forms contain information that may be useful to filers of form 965 a as such references to these instructions have been added throughout the instructions for form 965 a

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