



IRS Provides Relief to Domestic Partnerships Caught in GILTI Conundrum

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Helna Klumpp

IPB Tax Insider

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The IRS has provided filing relief to U.S. partnerships caught betwixt and between proposed and final guidance that required very different approaches to the reporting of a key income item. The relief should prevent many partnerships from having to make a difficult choice between the headache and expense of re-issuing K-1s or the threat of facing penalties.