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# SELECTED US TAX DEVELOPMENTS

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## RECENT DEVELOPMENTS MAKE IT EASIER FOR US-BASED MULTINATIONALS TO DISPOSE OF FOREIGN SUBSIDIARIES

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One area of tax planning that has benefited greatly from the flexibility provided by the US check-the-box rules for classifying eligible entities is planning for the disposition of foreign subsidiaries. This article describes the so-called check-and-sell technique, and explores two recent developments that have had a favourable impact on that strategy.

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