

Firm Events | December 9, 2020

Regulations on Withholding on Foreign Partners Finalized

SPEAKERS

[Morgan Klinzing](#)

Wednesday, December 9 • 1:00 – 2:00 p.m. ET

Tax legislation at the end of 2017 overturned case law, and practitioners' long-held view that gains on the sale of partnership interests by foreign partners were not subject to U.S. tax. Treasury has issued final regulations addressing the tax and withholding on partnership sales and distributions. These rules impact buyers, sellers and GPs in secondary transactions.

At our complimentary webinar, tax attorneys from Troutman Pepper Hamilton Sanders LLP discuss:

- New information and reporting rules impacting funds with foreign partners
- When general partners may be liable for failure to withhold
- How the exceptions to withholding have changed
- The new no harm, no foul rule
- How to calculate the amount of tax to be withheld

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