
From: Richard Joslin <[REDACTED]>
Sent: Wednesday, October 12, 2016 9:27 PM
To: Jeffrey E.; Brad Wechsler
Cc: John Castrucci; Thomas Turrin [REDACTED]
Subject: FW: foreign tax credit

Good news re foreign t=x credits – general category credits from 2015 should be carried over to 2016 (no carryback to 2014). One caveat and I will not put into =mail (pls call to discuss)

Foreign tax credits. 1 year carryback; 10 year carryforward. Credits arise from “general category ” income (ma=gement fees) or from “passive category” income (interest/ div=dends).

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In 2012, all carry forward and current year foreign tax credits were utilized.

General category credit =carryback of \$456,067 from 2013 (regular tax) and \$528,706 (alt min) would have been absorbed into 2012 for regular and alt min purposes.=o:p>

General category credit =carryback of \$490,837 from 2014 (regular tax) and \$196,6=1 (alt min) would not be carried back to 2013 and would be carried over to 2015= (no capacity to absorb in 2013 for regular and alt min purposes).

All passive category credits were utilized in 2013 and 2014.

Any unused passive category credit of \$143,307 from 2015 would be carried back and absorbed in 2014 (lost if not carried back)

Unused general category credit of \$1,881,188 from 2015 would not be carried back to 2014 and would be carried over to 2016 Carryover credit from 2014 would be carried over to 2016.=o:p>

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Regular tax (2012):

Alt min (2012):

Regular tax(2013)

Regular tax (2013) – general category – =full use (no capacity to absorb carryback)

Regular tax (2013) – passive category (capacity to absorb carryback passive category credit)

Alt min (2013) – full use of general category =redit

AMT 2013 (capacity to absorb carryback fo passive c=tegory tax credits)

Regular tax 2014

General category bucket – fully utilized NO capacity to absorb carry back

Regular tax 2014

Passive bucket (regular) fully use with capacity to absorb carryback credit

AMT 2014

GENERAL CATEGORY: Capacity to absorb general category credit of \$196,641

AMT 2014: PASSIVE CATEGORY capacity to absorb unused=passive category credits = 1,