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PROBLEMS 17. (LO 4, 5) BlueCo will not incur any U.S. income tax on GreenCo ' s earnings. GreenCo is a separate foreign corporation, made no dividend distribution to BlueCo, and did not create any

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deemed dividend under Subpart F.  
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foreign-source income. Certain exceptions apply, however, when the dividends are paid by the U.S. branch of a foreign corporation where 25% or more of the foreign corporation ' s gross income for the prior three years is effectively connected ...

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