

Income/Franchise: Multistate Tax Commission Work Group Circulates Draft Proposed Rule on **Investment Partnerships**

State Tax Treatment of Investment Partnerships: Proposed Draft Rule – Regulation Form, Multistate Tax Commission, Uniformity Committee (6/21/23). A draft proposed model rule prepared by the staff of the Multistate Tax Commission (MTC) as part of the MTC Uniformity Committee's project on the state taxation of partnerships has been posted for discussion, addressing the treatment of partnerships engaged primarily in investment activity and the taxation and sourcing of investment partnership income. According to MTC staff, the model rule's goal is to provide greater certainty in certain fact-specific situations by use of examples. As part of the MTC partnership tax work group's ongoing efforts to develop model rules on the tax treatment of partnerships, it continues to hold monthly calls that are open to the public. Please contact us with any questions.

URL: https://www.mtc.gov/wp-content/uploads/2023/06/Investment-Partnership-Model-6-15-23-1.pdf

Joe Garrett (Birmingham) — Managing Director **Deloitte Tax LLP** jogarrett@deloitte.com

> Shirley Wei (Los Angeles) Senior Manager **Deloitte Tax LLP** shiwei@deloitte.com

Jacob Shin (Los Angeles) Manager **Deloitte Tax LLP** jacshin@deloitte.com

Roburt Waldow (Minneapolis) Principal **Deloitte Tax LLP** rwaldow@deloitte.com

Olivia Schulte (Washington, DC) Manager **Deloitte Tax LLP** oschulte@deloitte.com

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organization") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500[®] and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 415,000 people worldwide make an impact that matters at www.deloitte.com.