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23. Definition of Type D (§17,157) 24.

Definition of Spin-Off, Split-Off, Split-Up

(§17,157) 25. Definition of Type E (§17,217)

Answers to Questions Types of Reorganization

1. There are seven types of reorganization as

defined in Code Sec. 368(a)(1): (1) Type A:

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Statutory merger or consolidation (2) Type B:
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Michael R. Schmidt, Commissioner. Michael R. Schmidt is the Commissioner of the New York State Department of Taxation and Finance. He was nominated by Governor Andrew M. Cuomo on January 6, 2019, and confirmed by the New

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York State Senate on June 20, 2019.

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consequently, New York taxable income. For a nonresident or part-year resident, GILTI is included in federal adjusted gross income and treated as income from an intangible. TSB-M-19(1)C and TSB-M-19(1)I, New York Department of Taxation and Finance, February 8, 2019

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