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Investment income such as dividends and interest typically is subject to a withholding tax when earned by a nonresident of a country. Income tax treaties reduce the rate of withholding. p. 25-6 2. Generally, dividends paid by a foreign corporation are 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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