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Final regulations: Withholding obligations incident to transfers of interests by foreign partners (text of regulations)

The IRS today posted on its website a version of final regulations (T.D. 9926) concerning the withholding obligations incident to transfers of interests by foreign partners in partnerships that engage in a U.S. trade or business.

Read the [final regulations](#) [PDF 601 KB] (156 pages)

These regulations finalized regulations that were proposed in May 2019. The preamble to the final regulations states that they retain the basic approach and structure of the proposed regulations with certain revisions based on comments received. Read a KPMG report on the proposed regulations: [TaxNewsFlash](#) [PDF 375 KB]

The version of the final regulations released by the IRS today includes the following statement:

This document is in the process of being submitted to the Office of the Federal Register (OFR) for publication and will be pending placement on public display at the OFR and publication in the Federal Register. The version of the final regulations released today may vary slightly from the published document if minor editorial changes are made during the OFR review process. The document published in the Federal Register will be the official document.

The purpose of this report is to provide text of the final regulations.

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