

A corporation is subject to corporate income tax. If the corporation is a resident of the United States, it is subject to corporate income tax on its worldwide income. If the corporation is a nonresident alien, it is subject to corporate income tax on its U.S. source income.

2017/2018

COMPANIONSHIP

Relationships between individuals who are not related by blood, marriage, or adoption, but who are treated as family members for purposes of the tax law, are referred to as "companionships." The tax law provides that a companion is treated as a family member for purposes of the tax law.

CONSTRUCTION FROM ANALYSIS

General principle: If a corporation is a resident of the United States, it is subject to corporate income tax on its worldwide income.

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Michael J. Padilla



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