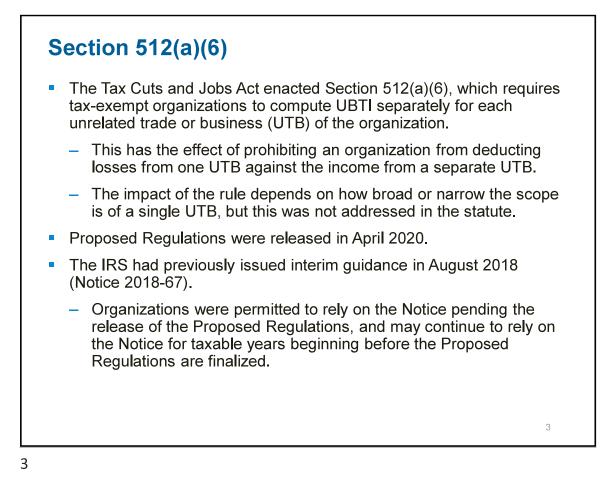
Proposed Regulations on UBTI "Siloing" Rule

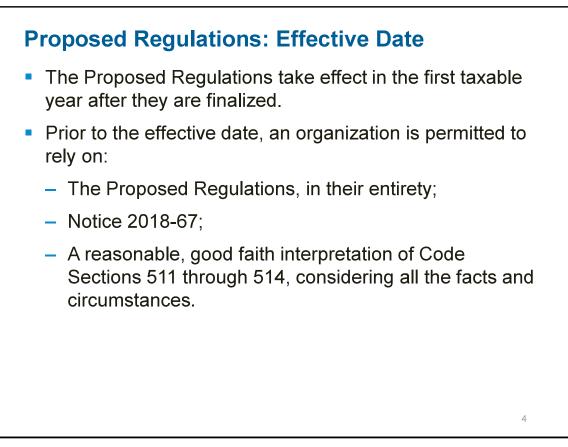
Brittany Cvetanovich & Rob Friz HETI Summer Series Part One, June 8, 2020

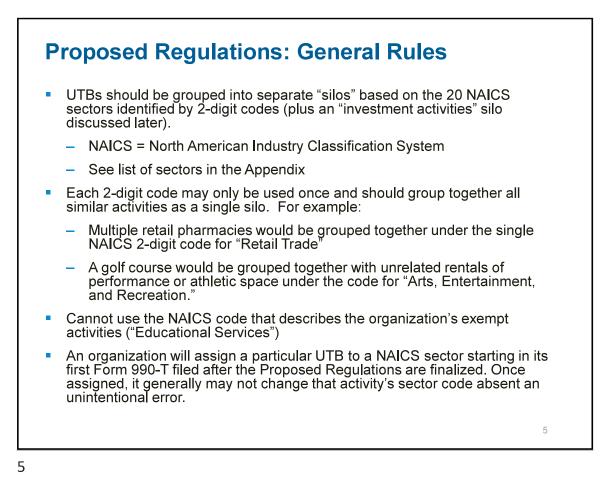
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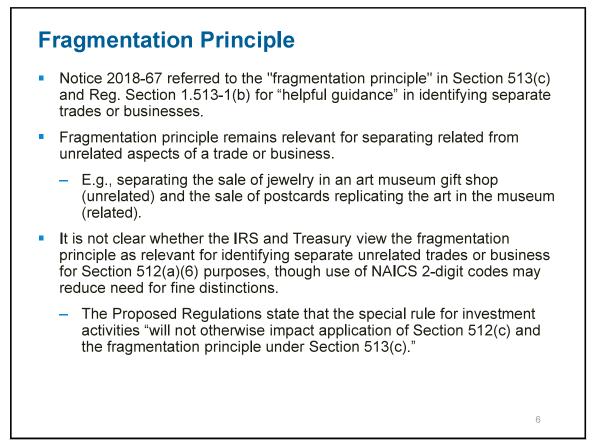
Agenda

- Background on Section 512(a)(6) and Notice 2018-67
- Overview of Proposed Regulations
 - General Rules
 - Special Rules for Investment Activities
- Effective Date
- Other Topics
- Open Questions
- Appendix









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First appeared as part of the conference materials for the 2020 Higher Education Taxation Institute - Summer Series session "Proposed Regulations on Siloing"