



ATTORNEYS AT LAW

Finn Dixon & Herling Tax Team Authors Comment Letter to Proposed Treasury Regulations on Deduction for “Qualified Business Income” of Pass-Through Entities

Date: 08/08/18

The Finn Dixon & Herling LLP (“FDH”) tax department has submitted a comment letter to the Internal Revenue Service regarding Proposed Regulations issued on August 8, 2018 under Section 199A of the Internal Revenue Code. Code Section 199A provides for a 20% deduction for the “qualified business income” of certain pass-through entities, and the Proposed Regulations seek to clarify the various types of income qualifying for the deduction. The FDH comment letter specifically addresses an element of the Proposed Regulations that FDH is concerned could negatively impact certain investment funds and fund managers that might otherwise have benefited from the deduction. A copy of the letter can be found [here](#). The FDH comment letter was also the subject of an article by Siri Bulusu entitled “Partnership Loans May Face Higher Tax Rate” published in the Bloomberg BNA Daily Tax Report on August 31, 2018.