

MEMO# 3215

October 23, 1991

CONNECTICUT DEPARTMENT OF REVENUE SERVICES RULING ON SERIES FUND PORTFOLIOS AS SEPARATE ENTITIES FOR TAX PURPOSES

October 23, 1991 TO: TAX COMMITTEE NO. 33-91 CONNECTICUT MEMBERS RE:
CONNECTICUT DEPARTMENT OF REVENUE SERVICES RULING ON SERIES FUND PORTFOLIOS
AS SEPARATE ENTITIES FOR TAX PURPOSES

_____. Attached is a ruling on the treatment of portfolios in a series fund as separate entities for Connecticut corporate tax purposes. The ruling concludes that each portfolio will be a separate corporation for all corporate tax purposes except the minimum and maximum additional tax calculated under Conn. Gen. Stat. section 12-219(a)(2). We will keep you informed of further developments.
David J. Mangefrida, Jr. Assistant Counsel - Tax Attachment

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