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Julie K. Kwon, GST Tax Update: Income & Transfer Tax Roundtable, ABA Real Property, Trust Sect., 9/16/05, p. 1 (“Kwon ’05” hereafter”). The inclusion ratio is one minus the “applicable fraction” rounded to the nearest one-thousandth (.001). IRC 2642(a)(1), Reg. 26.2642-1(a). The numerator of the “applicable fraction.” is the ...

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