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## “Proposed Regs Name Malta Pension Scheme as Listed Transaction,” in Tax Notes

Tom Cullinan quoted in article, “Proposed Regs Name Malta Pension Scheme as Listed Transaction,” in Tax Notes

*Tax Notes*

June 7, 2023

In a June 7, 2023, Tax Notes article, Atlanta-based Shareholder Tom Cullinan discusses the recently proposed Treasury and IRS rules that define Malta personal retirement schemes used to avoid U.S. taxes as listed transactions.

Cullinan mentions that the notice serves two key purposes: It prospectively dissuades taxpayers from entering into the transactions, and it provides the IRS with a means of capturing the activities of taxpayers that already have reported the transaction on a return.

He also pointed out that the listing notice effectively extends the period during which the IRS can scrutinize transactions and make assessments.

To learn more, subscribers may view the full article [here](#).