Published on The National Law Review https://www.natlawreview.com

## YA Global Investments, LP v. Commissioner: Tax Court Rules that Fund was Engaged in U.S. Trade or Business

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National Law Review, Volumess XIII, Number 327

Source URL:<u>https://www.natlawreview.com/article/ya-global-investments-lp-v-commissioner-tax-court-rules-fund-was-engaged-us-trade</u>