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Unrelated business income will result in UBIT unless an exception or exclusion is available. Commerciality Doctrine It is helpful to understand that the law related to unrelated business income was implemented by Congress in 1950 to curb unfair competitive advantage of tax-exempt organizations over commercial for-profit entities.

Unrelated Business Income Taxes (UBIT) in a Nutshell

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Soon after deciding McMinn, the Court of Appeals considered whether a municipality can restrict the number of unrelated persons living together as the functional equivalent of a natural family, while allowing an unlimited number of related persons to reside together. In Baer v.

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