

STATE OF NEW JERSEY
DEPARTMENT OF THE TREASURY
DIVISION OF TAXATION

Schedule RT
(R. 11/18)

**NEW JERSEY
CORPORATION
BUSINESS TAX**



Allocated Tiered Subsidiary
Dividend Exclusion

Purpose

Schedule RT is a standalone schedule to be completed and included with a taxpayer's Form CBT-100 or Form BFC-1. Taxpayers will use this schedule to exclude dividends received from a subsidiary if that subsidiary filed a tax return and paid New Jersey corporation business tax on the dividends it received from other subsidiaries. The dividends must have been included in the subsidiary's allocated entire net income and the tax the subsidiary paid on the dividends must have exceeded the minimum tax.

New Jersey follows the federal ownership attribution rules.

A tiered subsidiary is a stand-alone entity that operates on another level within a group of subsidiaries that are owned by an entity that operates on the first level, which is owned by an upper-level parent corporation.

Tiered dividends are dividends reported on the subsidiary's Form CBT-100 or Form BFC-1 as dividend income from the subsidiary which is then issued to the parent company as a dividend.

For example:

Company A has \$100,000,000 of dividend income from its subsidiary Company B.

Company B has \$80,000,000 of dividend income from subsidiary Company C.

If Company B paid tax on its Form CBT-100 or BFC-1 on the \$80,000,000 and has an allocation factor greater than Company A, Company A can exclude \$80,000,000 from its CBT-100 or BFC-1.

Part I

Provide the requested information for dividends included in entire net income from investments in which the taxpayer owns 80% or more of the voting stock and all other classes of stock of a subsidiary. Only include itemized dividends if the subsidiary distributing the dividends to the taxpayer filed and paid tax to New Jersey on the dividends in 2017.

DO NOT include dividend income received from a subsidiary if the subsidiary has not filed and paid tax to New Jersey on the dividends.

Column 2: Include dividends received from a lower tier subsidiary. Use the amount before any dividend exclusion.

Column 3: If an individual row is \$2,000 or less, enter 0 in Column 5 of that row. The tax the subsidiary paid on the dividends must have exceeded the minimum tax, unless the subsidiary also used its New Jersey tax credits. If the tax was reduced to less than \$2,000 because of a tax credit, use the actual amount.

Column 4: Use the allocation factor as reported on Schedule R, Part II, Section A, line 2. This is the lesser of 3.5% or the average of the allocation factors (from Schedule J) for Tax Years 2014, 2015, and 2016. If one of those returns was a short-year return, the allocation from that year will count for the special three-year average allocation formula. If the taxpayer has filed fewer than three periods, take the average of the periods being reported. All allocation factors must be carried out to 6 decimal places.

Column 5: Carry the amount from line 1 to Part III. Use the amount from line 2 to complete Schedule R (or Schedule PT, if applicable).

Part II

Provide the requested information for all dividends included in entire net income from investments in which the taxpayer took either the 50% or 0% Dividend Exclusion. **DO NOT** include dividend income received from a subsidiary if the subsidiary has not filed and paid tax to New Jersey on the dividends.

Column 4: If an individual row is \$2,000 or less, enter 0 in Column 5 of that row. The tax the subsidiary paid on the dividends must have exceeded the minimum tax, unless the subsidiary also used its New Jersey tax credits. If the tax was reduced to less than \$2,000 because of tax credits, use the actual amount.

Column 5: Include dividends received from a lower tier subsidiary. Use the amount before any dividend exclusion.

Part III

Add the amounts and carry the total to Schedule R or Schedule PT.

