



Dan Bucks  
Director

# Montana Department of Revenue



Brian Schweitzer  
Governor

## MEMORANDUM

To: Revenue and Transportation Interim Committee (RTIC)

From: Dan Bucks, Director 

Date: November 19, 2010

Subject: MCA Section 15-31-322(2) Biennial Report on Tax Haven Countries

In accordance with the above referenced section of the MCA, attached is the required biennial report that provides an update on countries that may be considered tax havens by Montana statute.

Based upon this report, it is my recommendation that the RTIC request legislation to add the following countries to the list of tax havens under MCA Section 15-31-322(f):

- Ireland
- Netherlands

Additionally the language in 15-31-322(1)(f), MCA, should be amended to apply not only to corporations incorporated in tax havens, but also to companies treated as headquartered or managed in the tax havens.

I look forward to the opportunity to discuss this report in detail with members of the committee.