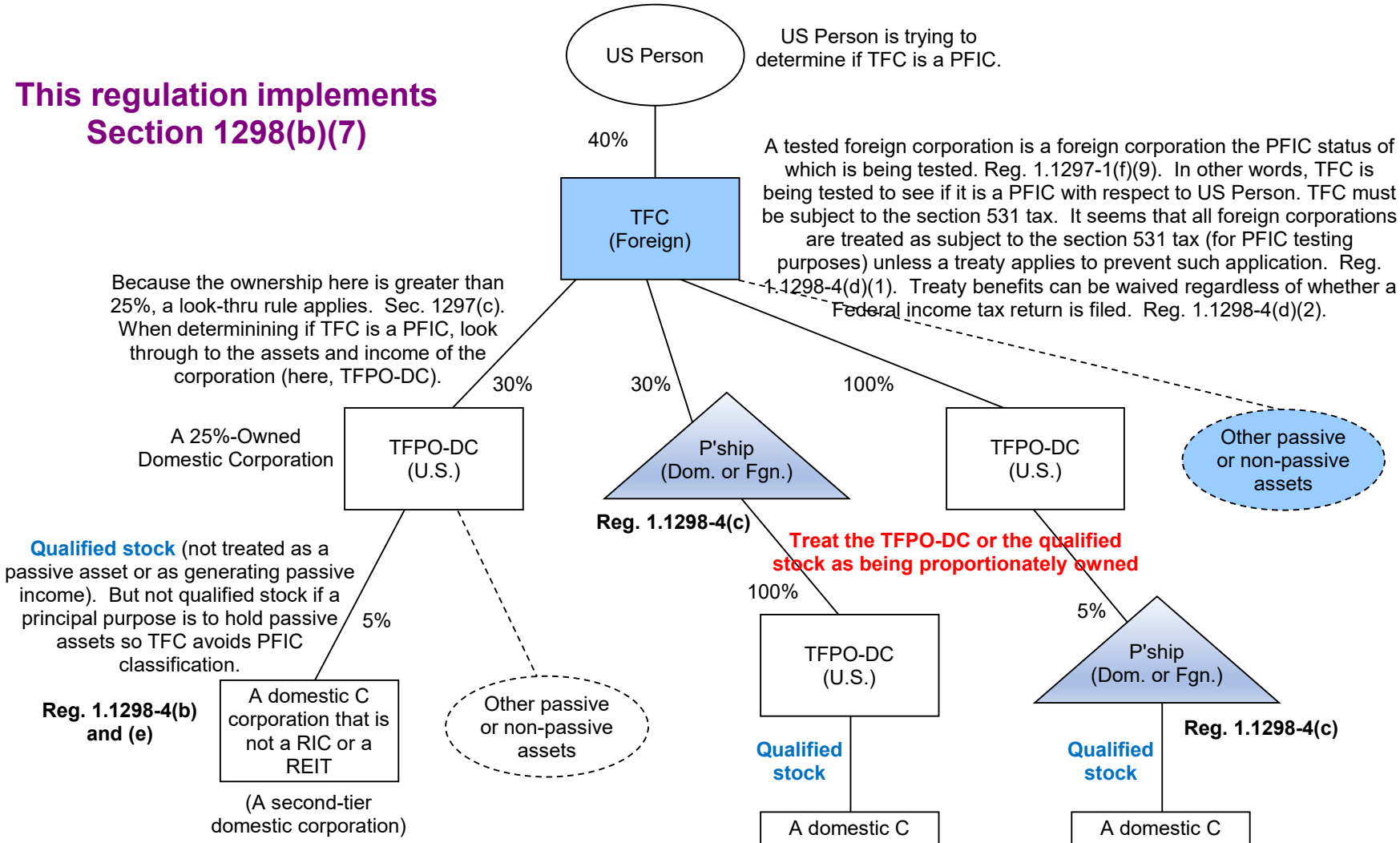
Reg. 1.1298-4 Example

Possible PFICs Owning 25%-Owned Domestic Corps

Copyright © 2022 Andrew Mitchel LLC
International Tax Services
www.andrewmitchel.com

This regulation implements Section 1298(b)(7)



See also PLR 201322009 and PLR 201515006 (published prior to these regulations)

Section 531 imposes the accumulated earnings tax. Foreign corporations are generally subject to the accumulated earnings tax only with respect to their U.S.-source income. Reg. 1.532-1(c).

HUNDREDS of additional charts at www.andrewmitchel.com