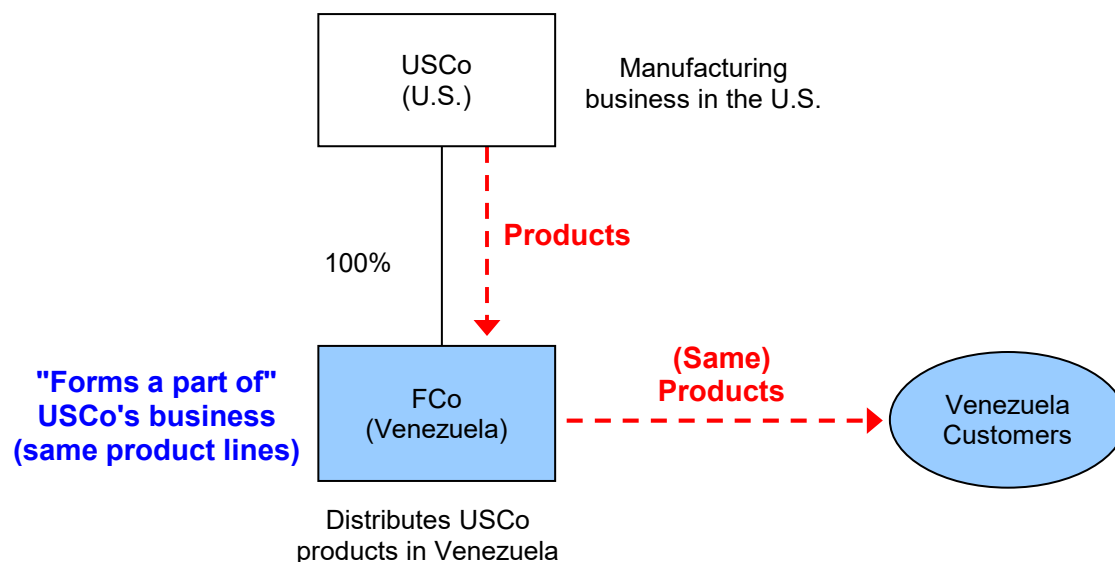


**Venezuela Treaty (1999)  
Treasury Tech. Explan.,  
Article 17, Paragraph 1,  
Example 1**

**Venezuela Distributor Activity  
"Forms a Part of"  
U.S. Manufacturer Activity**

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**Limitation on benefits:**

**Active trade or  
business test  
("derived in  
connection with")**

USCo is a corporation resident in the United States. USCo is engaged in an active manufacturing business in the United States. USCo owns 100 percent of the shares of FCo, a corporation resident in Venezuela. FCo distributes USCo products in Venezuela. Since the business activities conducted by the two corporations involve the same products, FCo's distribution business is considered to form a part of USCo's manufacturing business within the meaning of subparagraph 1(d).