

**Reg. 1.958-1(b),
Example**

**Indirect Ownership Thru Foreign
Corporations; Attribution Stops with
First U.S. Person Going Up the Chain**

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Domestic corporation M owns 75 percent of the one class of stock in foreign corporation R, which in turn owns 80 percent of the one class of stock in foreign corporation S, which in turn owns 90 percent of the one class of stock in foreign corporation T. Under Reg. 1.958-1(b), R Corporation is considered as owning 80 percent of the 90 percent of the stock which S Corporation owns in T Corporation, or 72 percent. Corporation M is considered as owning 75 percent of such 72 percent of the stock in T Corporation, or 54 percent. Since M Corporation is a domestic corporation, the attribution under Reg. 1.958-1(b) stops with M Corporation, even though, illustratively, such corporation is wholly owned by domestic corporation N.

