

116TH CONGRESS
1ST SESSION

H. R. 5240

To amend the Internal Revenue Code of 1986 to make the look-thru rule
for related controlled foreign corporations permanent.

IN THE HOUSE OF REPRESENTATIVES

NOVEMBER 21, 2019

Mr. KIND (for himself, Mr. HOLDING, Ms. MOORE, Mrs. WALORSKI, Mr. SUOZZI, Mr. LAHOOD, Mr. HIGGINS of New York, Mr. FERGUSON, Mr. LARSON of Connecticut, Mr. ESTES, Ms. SEWELL of Alabama, Mr. SCHNEIDER, and Mr. SMITH of Missouri) introduced the following bill; which was referred to the Committee on Ways and Means

A BILL

To amend the Internal Revenue Code of 1986 to make
the look-thru rule for related controlled foreign corpora-
tions permanent.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. LOOK-THRU RULE FOR RELATED CONTROLLED**
4 **FOREIGN CORPORATIONS MADE PERMA-**
5 **NENT.**

6 (a) IN GENERAL.—Section 954(c)(6) of the Internal
7 Revenue Code of 1986 is amended by striking subpara-
8 graph (C).

1 (b) EFFECTIVE DATE.—The amendment made by
2 this section shall apply to taxable years of foreign corpora-
3 tions beginning after December 31, 2019, and to taxable
4 years of United States shareholders with or within which
5 such taxable years of foreign corporations end.

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