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“Untangling the Constructive Ownership Rules for Foreign Entity Information Returns,” Journal of Taxation, September 2012 “Using Inconsistent Regulations as a Defense Against 5471 Information Reporting Penalties,” Journal of International Taxation , March 2012 Page 1/5.

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Constructive ownership means you are closely related to the real owner – so closely, in fact, that the IRS thinks you should be treated like a owner, even if you are not one in real life. Example: Your spouse owns 100% of the stock of a corporation. You are treated as the constructive owner of your spouse's stock. Back to our example.

~~Form 5471, Constructive Ownership, and Exceptions ...~~

Stock constructively owned by an individual by reason of the

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application of paragraph (1) shall not be considered as owned by him for purposes of again applying paragraph (1) in order to make another the constructive owner of such stock. (C) Partnerships, estates, trusts, and corporations

~~26 U.S. Code § 318 — Constructive ownership of stock | U.S. ...~~

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Constructive Ownership - A person or entity has constructive ownership when they are deemed to own stock via application of Section 318(a) as modified by Section 958(b). In general, these rules operate as follows: Family Members - An individual is deemed to own the stock owned by his spouse, children, grandchildren, and parents.

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corporation has a filing requirement is because the constructive ownership rules of Reg. § 1.6038-2(c) made this a requirement (true in our example); and The real shareholder (the person who owns 100% of the stock of both

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~~Daniel Martinez — Miami, FL Tax Attorney~~

Thus, the attribution rules of paragraph (a) (2) of § 1.958-1 are used with respect to A inasmuch as he owns a larger total percentage of the

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stock of N Corporation under such rules; and the attribution rules of paragraphs (c) (1) (iii) and (c) (2) of this section are used with respect to B inasmuch as he owns a larger total percentage of the stock of N Corporation under such rules.

~~26 CFR § 1.958-2 — Constructive ownership of stock. | CFR ...~~

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