

HR 5751

To amend the Internal Revenue Code of 1986 to restore the limitation on downward attribution of stock ownership in applying constructive ownership rules.

**Congress:** 118 (2023–2025, Ended)  
**Chamber:** House  
**Policy Area:** Taxation  
**Introduced:** Sep 27, 2023  
**Current Status:** Referred to the House Committee on Ways and Means.  
**Latest Action:** Referred to the House Committee on Ways and Means. (Sep 27, 2023)  
**Official Text:** <https://www.congress.gov/bill/118th-congress/house-bill/5751>

Sponsor

**Name:** Rep. Ferguson, A. Drew, IV [R-GA-3]  
**Party:** Republican • **State:** GA • **Chamber:** House

Cosponsors (6 total)

Cosponsor	Party / State	Role	Date Joined
Rep. Estes, Ron [R-KS-4]	R · KS		Sep 27, 2023
Rep. Moore, Gwen [D-WI-4]	D · WI		Sep 27, 2023
Rep. Panetta, Jimmy [D-CA-19]	D · CA		Sep 27, 2023
Rep. Schneider, Bradley Scott [D-IL-10]	D · IL		Sep 27, 2023
Rep. Steel, Michelle [R-CA-45]	R · CA		Sep 27, 2023
Rep. Tenney, Claudia [R-NY-24]	R · NY		Oct 2, 2023

Committee Activity

Committee	Chamber	Activity	Date
Ways and Means Committee	House	Referred To	Sep 27, 2023

Subjects & Policy Tags

Policy Area:

Taxation

Related Bills

No related bills are listed.

Summary (as of Sep 27, 2023)

This bill restores the limitation on downward attribution rules to 50% of stock ownership in applying constructive ownership rules to controlled foreign corporations.

## Actions Timeline

---

- **Sep 27, 2023:** Introduced in House
- **Sep 27, 2023:** Referred to the House Committee on Ways and Means.