

## **Tax Reduction Letter**

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## **Internal Revenue Code Section 368(c)**

Definitions relating to corporate reorganizations.

. . .

(c) Control defined. For purposes of part I (other than section 304), part II, this part, and part V, the term "control" means the ownership of stock possessing at least 80 percent of the total combined voting power of all classes of stock entitled to vote and at least 80 percent of the total number of shares of all other classes of stock of the corporation.