

Example: GILTI & FDII with FTC

GILTI Income	Foreign 1	Foreign 2	Foreign 3	Foreign 4	Aggregate
Net CFC tested income (loss)	(10)	250	3,000	250	3,490
Qualified business assets investment (QBAI)	100	200	3,000	400	3,700
Net deemed tangible rate	10%	10%	10%	10%	10%
Net deemed tangible income return	10	20	300	40	370
Global low tax intangible income	-	230	2,700	210	3,120

Deemed Paid FTC - Eligible	Foreign 1	Foreign 2	Foreign 3	Foreign 4	Aggregate
Tested Foreign income (Taxes)	N/A	40	20	90	150
Section 960(d)(1) limitation	80%	80%	80%	80%	80%
Inclusion percentage					89.4%
Deemed Paid FTC - Eligible					107.28

FDII	Aggregate
FDII %	37.50%
GILTI deduction %	50.00%
FDII of domestic corp.	400.00
GILTI (increased by 100% of the Sec. 78 gross up)	3,254.10
Total Deduction	1,777.05

Taxable Income Impacts	Aggregate
Taxable income – GILTI+FDII less total deduction	1,742.95
Section 78 gross-up	134.10
Tax rate	21%
Pre-credit Tax	394.18
Deemed Paid FTC	107.28
Net Tax Due	286.90

