## Caution: DRAFT FORM

This is an advance proof copy of an IRS tax form. It is subject to change and OMB approval before it is officially released. You can check the scheduled release date on our web site (www.irs.gov).

If you have any comments on this draft form, you can submit them to us on our web site. Include the word DRAFT in your response. You may make comments anonymously, or you may include your name and e-mail address or phone number. We will be unable to respond to all comments due to the high volume we receive. However, we will carefully consider each suggestion. So that we can properly consider your comments, please send them to us within 30 days from the date the draft was posted.

Information Return of U.S. Persons With Respect To Certain Foreign Corporations

- See separate instructions.
(Rev. December 2007)

Department of the Treasury Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning section $20 \quad$, and ending $\quad, 20$

B Category of filer (See instructions. Check applicable box(es)):
1 (repealed) $2 \square \quad 3 \square \quad 4 \square \quad 5 \square$

C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period

Attachment Sequence No. 121 ,
Name of person filing this return

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)
, 20
Filer's tax year beginning , 20 , and ending
D Person(s) on whose behalf this information return is filed:


Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation $\quad$ b Employer identification number, if any $\quad$|  |
| :--- |

c Country under whose laws incorporated

| d Date of incorporation | e Principal place of business | frincipal business activity <br> code number | g Principal business activity | h Functional currency |
| :--- | :--- | :--- | :--- | :--- | :--- |

2 Provide the following information for the foreign corporation's accounting period stated above.
a Name, address, and identifying number of branch office or agent (if any) in $\quad$ b If a U.S. income tax return was filed, enter: the United States
c Name and address of foreign corporation's statutory or resident agent in country of incorporation
(ii) U.S. income tax paid (after all credits)

Schedule A Stock of the Foreign Corporation

| (a) Description of each class of stock | (b) Number of shares issued and outstanding |  |
| :--- | :--- | :--- |
|  | (i) Beginning of annual <br> accounting period | (ii) End of annual <br> accounting period |
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## Schedule B U.S. Shareholders of Foreign Corporation (see instructions)

| (a) Name, address, and identifying number of shareholder | (b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a). | (c) Number of shares held at beginning of annual accounting period | (d) Number of shares held at end of annual accounting period | (e) Pro rata share of subpart F income (enter as a percentage) |
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Schedule C Income Statement (see instructions)
Important: Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for DASTM corporations.


## Schedule E Income, War Profits, and Excess Profits Taxes Paid or Accrued (see instructions)



## Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.


## Schedule G Other Information

1 During the tax year, did the foreign corporation own at least a $10 \%$ interest, directly or indirectly, in any foreign partnership?
If "Yes," see the instructions for required attachment.
2 During the tax year, did the foreign corporation own an interest in any trust?
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as entities separate from their owners under Regulations sections 301.7701-2 and 301.7701-3 (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity (see instructions).
4 During the tax year, was the foreign corporation a participant in any cost sharing arrangement?
5 During the course of the tax year, did the foreign corporation become a participant in any cost sharing arrangement?

## Schedule H Current Earnings and Profits (see instructions)

Important: Enter the amounts on lines 1 through 5c in functional currency.
1 Current year net income or (loss) per foreign books of account
2 Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):
a Capital gains or losses
b Depreciation and amortization
c Depletion
d Investment or incentive allowance
e Charges to statutory reserves.
f Inventory adjustments
g Taxes.
h Other (attach schedule)
3 Total net additions
4 Total net subtractions
5a Current earnings and profits (line 1 plus line 3 minus line 4)
b DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)
c Combine lines 5a and 5b

d Current earnings and profits in U.S. dollars (line 5c translated at the appropriate exchange rate as defined in section 989(b) and the related regulations (see instructions)) . Enter exchange rate used for line 5d

## Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

1 Subpart F income (line 38b, Worksheet A in the instructions)

2 Earnings invested in U.S. property (line 17, Worksheet B in the instructions)
3 Previously excluded subpart F income withdrawn from qualified investments (line 6b, Worksheet C in the instructions)
4 Previously excluded export trade income withdrawn from investment in export trade assets (line 7b, Worksheet D in the instructions).

5 Factoring income

6 Total of lines 1 through 5. Enter here and on your income tax return. See instructions.
7 Dividends received (translated at spot rate on payment date under section 989(b)(1))
8 Exchange gain or (loss) on a distribution of previously taxed income

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- Was any income of the foreign corporation blocked?
- Did any such income become unblocked during the tax year (see section 964(b))?.

If the answer to either question is "Yes," attach an explanation.

