

# Tax Year 2007 Work Request Notification

Schedule O (Form 5471), Organization or Reorganization of Foreign Corporation,  
and Acquisitions and Dispositions of its Stock

To:	Symbols:	Initials:	Date:
1. Scanned by:	SE:W:CAR:MP:T:B: C		
2. Section Chief: Barbara Bradley	SE:W:CAR:MP:T:B: C	PMB	9/28/06
3. Reviewer: Steve Becker	SE:W:CAR:MP:T:B: R	SWB	10/2/06
4. Review Chief: Ed Mikesell	SE:W:CAR:MP:T:B: R	EM	10/4/06
5. Branch Chief: Curt Freeman	SE:W:CAR:MP:T:B	C	10/4
6. Senior Technical Advisor: <del>Bob Erickson</del>	SE:W:CAR:MP:T	C	10/5
7. *TPCC Circulations Email sent to Distribution List by:			
8. Initiator (Tax Law Specialist): Doris Williams	SE:W:CAR:MP:T:B: C	Completed:	

Attached is a marked up draft that can be used to develop any necessary Work Requests for the 2008 processing year. The major changes are as follows:

We are making the following program changes for the December 2007 revision of the schedule at the request of LMSB.

On page 2:

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- 1) We are deleting Section E---Organization or Reorganization of Foreign Corporation.
  - 2) We are revising the text of line (a) under Section X---Additional Information and adding Yes/No check boxes to this line. We are also deleting line (c) under Section X.
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This Notification is for changes due to:


Legislation or other Chief Counsel guidance:

A Program change initiated by: **Form 5471 Taskforce/LMSB**

We do not anticipate the need for any further changes that would require a Work Request Notification.

We may need to make further changes that would require a subsequent Work Request Notification.

If you have any questions, please contact the TLS shown below, or the reviewer on line 3 (above).

From:  <b>Doris Williams</b>	Initials: <b>DEW</b>	Room: C7-375	Email: <b>Doris.E.Williams@irs.gov</b>
SE:W:CAR:MP:T:B:C	Date: 09/28/2006	Phone Number: (202) 283-0413	Fax Number:

**SCHEDULE O  
(Form 5471)**

(Rev. December 2007)

Department of the Treasury  
Internal Revenue Service

**Organization or Reorganization of Foreign Corporation, and Acquisitions and Dispositions of its Stock**

OMB No. 1545-0704

▶ Attach to Form 5471. See Instructions for Form 5471.

Name of person filing Form 5471	Identifying number
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Name of foreign corporation

**Important:** Complete a *separate* Schedule O for each foreign corporation for which information must be reported.

**Part I To Be Completed by U.S. Officers and Directors**

(a) Name of shareholder for whom acquisition information is reported	(b) Address of shareholder	(c) Identifying number of shareholder	(d) Date of original 10% acquisition	(e) Date of additional 10% acquisition

**Part II To Be Completed by U.S. Shareholders**

**Note:** If this return is required because one or more shareholders became U.S. persons, attach a list showing the names of such persons and the date each became a U.S. person.

**Section A—General Shareholder Information**

(a) Name, address, and identifying number of shareholder(s) filing this schedule	(b) For shareholder's latest U.S. income tax return filed, indicate:			(c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation
	(1) Type of return (enter form number)	(2) Date return filed	(3) Internal Revenue Service Center where filed	

**Section B—U.S. Persons Who Are Officers or Directors of the Foreign Corporation**

(a) Name of U.S. officer or director	(b) Address	(c) Social security number	(d) Check appropriate box(es)	
			Officer	Director

**Section C—Acquisition of Stock**

(a) Name of shareholder(s) filing this schedule	(b) Class of stock acquired	(c) Date of acquisition	(d) Method of acquisition	(e) Number of shares acquired		
				(1) Directly	(2) Indirectly	(3) Constructively



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(f) Amount paid or value given	(g) Name and address of person from whom shares were acquired

**Section D—Disposition of Stock**

(a) Name of shareholder disposing of stock	(b) Class of stock	(c) Date of disposition	(d) Method of disposition	(e) Number of shares disposed of		
				(1) Directly	(2) Indirectly	(3) Constructively

(f) Amount received	(g) Name and address of person to whom disposition of stock was made

**Section E—Organization or Reorganization of Foreign Corporation**

(a) Name and address of transferor			(b) Identifying number (if any)	(c) Date of transfer

(d) Assets transferred to foreign corporation			(e) Description of assets transferred by, or notes or securities issued by, foreign corporation
(1) Description of assets	(2) Fair market value	(3) Adjusted basis (if transferor was U.S. person)	

**Section F—Additional Information**

(a) ~~the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the consolidated return), the taxable income or loss, and the U.S. income tax paid (after all credits).~~

(b) List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock ▶

(c) ~~If the foreign corporation is a member of a group constituting a chain of ownership, attach a chart, for each unit of which a shareholder owns 10% or more in value or voting power of the outstanding stock. The chart must indicate the corporation's position in the chain of ownership and the percentages of stock ownership (see instructions for an example).~~

separately report a transaction with the foreign corporation under section 332, 351, 355, 367, or 368 as required by the applicable regulation? .....  Yes  No

If "Yes," indicate the specific location (form, schedule, and line) in the tax return ▶ \_\_\_\_\_

Did any U.S. shareholder of

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