

**Foreign Partner's Information Statement
of Section 1446 Withholding Tax**

Department of the Treasury
Internal Revenue Service

▶ See separate Instructions for Forms 8804, 8805, and 8813.

For partnership's calendar year 2010, or tax year beginning _____, 2010, and ending _____, 20

Copy A for Internal Revenue Service
Attach to Form 8804.

1a Foreign partner's name	b U.S. identifying number	5a Name of partnership	b U.S. EIN
c Address (if a foreign address, see instructions)		c Address (if a foreign address, see instructions)	
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7.	
3 Type of partner (specify—see instructions) ▶		7 Withholding agent's U.S. employer identification number	
4 Country code of partner (enter two-letter code; see instructions)			
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>			
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>			
9 Partnership's ECTI allocable to partner for the tax year (see instructions)			9
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.			10

Schedule T—Beneficiary Information (see instructions)

11a Name of beneficiary	c Address (if a foreign address, see instructions)
b U.S. identifying number of beneficiary	
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)	12
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)	13

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For partnership's calendar year 2010, or tax year beginning _____, 2010, and ending _____, 20

Copy B for partner
Keep for your records.

1a Foreign partner's name	b U.S. identifying number	5a Name of partnership	b U.S. EIN
c Address (if a foreign address, see instructions)		c Address (if a foreign address, see instructions)	
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7.	
3 Type of partner (specify—see instructions) ▶		7 Withholding agent's U.S. employer identification number	
4 Country code of partner (enter two-letter code; see instructions)			
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>			
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>			
9 Partnership's ECTI allocable to partner for the tax year (see instructions)			9
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.			10

Schedule T—Beneficiary Information (see instructions)

11a Name of beneficiary	c Address (if a foreign address, see instructions)
b U.S. identifying number of beneficiary	
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)	12
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)	13

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For partnership's calendar year 2010, or tax year beginning _____, 2010, and ending _____, 20

2010

Copy C for partner
 Attach to your Federal tax return.

1a Foreign partner's name	b U.S. identifying number	5a Name of partnership	b U.S. EIN
c Address (if a foreign address, see instructions)		c Address (if a foreign address, see instructions)	
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7.	
3 Type of partner (specify—see instructions) ▶		7 Withholding agent's U.S. employer identification number	
4 Country code of partner (enter two-letter code; see instructions)			
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>			
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>			
9 Partnership's ECTI allocable to partner for the tax year (see instructions)			9
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.			10

Schedule T—Beneficiary Information (see instructions)

11a Name of beneficiary	c Address (if a foreign address, see instructions)
b U.S. identifying number of beneficiary	
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)	12
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)	13

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For partnership's calendar year 2010, or tax year beginning _____, 2010, and ending _____, 20

Copy D for
Withholding Agent.

1a Foreign partner's name	b U.S. identifying number	5a Name of partnership	b U.S. EIN
c Address (if a foreign address, see instructions)		c Address (if a foreign address, see instructions)	
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7.	
3 Type of partner (specify—see instructions) ▶		7 Withholding agent's U.S. employer identification number	
4 Country code of partner (enter two-letter code; see instructions)			
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>			
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>			
9 Partnership's ECTI allocable to partner for the tax year (see instructions)			9
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.			10

Schedule T—Beneficiary Information (see instructions)

11a Name of beneficiary	c Address (if a foreign address, see instructions)
b U.S. identifying number of beneficiary	
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)	12
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