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	IEDULE P m 5471) Previous	ly Taxed E	arnings an	d Profits o	of U.S. Sha	reholder of	Certain F	oreign Corp	oorations		
Depa	(December 2018) ► Attach to Form 5471. Department of the Treasury ► Go to www.irs.gov/Form5471 for instructions and the latest information.										
	al Revenue Service '			a h		0	0	0	Identi	fying number	
	of foreign corporation	JU			EI		EIN (if any)		Refere	ence ID number (s	ee instructions)
	a Separate Category (Enter code—see instructions.)										
	Previously Taxed E&P (see instructions)										
	Important: Enter amounts in functional currency.	(a) Earnings Invested in U.S. Property (section 959(c)(1)(A))	(b) Section 965(a) Inclusion (section 959(c)(1)(A))	(c) Section 965(b)(4)(A) (section 959(c)(1)(A))	(d) Section 951A Inclusion (section 959(c)(1)(A))	(e) Earnings Invested in Excess Passive Assets (section 959(c)(1)(B))	(f) Subpart F Income (section 959(c)(2))	(g) Section 965(a) Inclusion (section 959(c)(2))	(h) Section 965(b)(4)(A) (section 959(c)(2))	(i) Section 951A Inclusion (section 959(c)(2))	(j) Total
1 a	Balance at beginning of year (see instructions)										
1b	Beginning balance adjustments (attach statement)										
1c	Adjusted beginning balance (combine lines 1a and 1b)										
2	Reduction for taxes unsuspended under anti-splitter rules										
3	E&P attributable to distributions of previously taxed E&P from lower- tier foreign corporation										
4	E&P carried over in nonrecognition transaction										
5	Other adjustments (attach statement)										
6	Total current and accumulated E&P (combine lines 1c through 5)										
7	Amounts reclassified to section 959(c)(2) E&P from section 959(c) (3) E&P										
8	Actual distributions of previously taxed income										
9	Amounts reclassified to section 959(c)(1) E&P from section 959(c) (2) E&P										

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Previously Taxed E&P (see instructions) (continued)											
	Important: Enter amounts in functional currency.	(a) Earnings Invested in U.S. Property (section 959(c)(1)(A))	(b) Section 965(a) Inclusion (section 959(c)(1)(A))	(c) Section 965(b)(4)(A) (section 959(c)(1)(A))	(d) Section 951A Inclusion (sectior 959(c)(1)(A))	(e) Earnings Invested in Excess Passive Assets (section 959(c)(1)(B))	(f) Subpart F Income (section 959(c)(2))	(g) Section 965(a) Inclusion (section 959(c)(2))	(h) Section 965(b)(4)(A) (section 959(c)(2))	(i) Section 951A Inclusion (section 959(c)(2))	(i) Total
10	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)		EII		ei						
11	Other adjustments (attach statement)			RI (
12	Balance at beginning of next year (combine lines 6 through 11)										

Schedule P (Form 5471) (12-2018)