



Note: *The draft you are looking for begins on the next page.*

Caution: DRAFT—NOT FOR FILING

This is an early release draft of an IRS tax form, instructions, or publication, which the IRS is providing for your information. **Do not file draft forms** and do **not** rely on draft forms, instructions, and publications for filing. We do **not** release draft forms until we believe we have incorporated all changes (except when explicitly stated on this coversheet). However, unexpected issues occasionally arise, or legislation is passed—in this case, we will post a new draft of the form to alert users that changes were made to the previously posted draft. Thus, there are never any changes to the last posted draft of a form and the final revision of the form. Forms and instructions generally are subject to OMB approval before they can be officially released, so we post only drafts of them until they are approved. Drafts of instructions and publications usually have some changes before their final release.

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Almost every form and publication has a page on IRS.gov with a friendly shortcut. For example, the Form 1040 page is at [IRS.gov/Form1040](https://www.irs.gov/Form1040); the Pub. 501 page is at [IRS.gov/Pub501](https://www.irs.gov/Pub501); the Form W-4 page is at [IRS.gov/W4](https://www.irs.gov/W4); and the Schedule A (Form 1040/SR) page is at [IRS.gov/ScheduleA](https://www.irs.gov/ScheduleA). If typing in a link above instead of clicking on it, be sure to type the link into the address bar of your browser, not a Search box.

If you wish, you can submit comments to the IRS about draft or final forms, instructions, or publications at [IRS.gov/FormsComments](https://www.irs.gov/FormsComments). We cannot respond to all comments due to the high volume we receive and may not be able to consider many suggestions until the subsequent revision of the product.

If you have comments on reducing paperwork and respondent (filer) burden, with respect to draft or final forms, please respond to the relevant information collection through the Federal Register process; for more info, click [here](#).

Distribution number _____		OMB No. 1545-0902	Statement of Withholding Under Section 1446(f)(4) on Dispositions by Foreign Persons of Partnership Interests
WITHHOLDING AGENT'S (PARTNERSHIP'S) name	WITHHOLDING AGENT'S (PARTNERSHIP'S) U.S. EIN	Form 8288-C (January 2023)	
Street address, city or town, state or province, country, and ZIP or foreign postal code		1 Date of transfer (mm/dd/yyyy) / /	
PARTNER'S (TRANSFEREE'S) name subject to withholding	PARTNER'S (TRANSFEREE'S) U.S. TIN	2 Amount realized \$	Copy A For Internal Revenue Service Center
Street address, city or town, state or province, country, and ZIP or foreign postal code		3 Amount withheld \$	
		4 Date of this distribution (mm/dd/yyyy) / /	
SELLER'S (TRANSFEROR'S) name	SELLER'S (TRANSFEROR'S) U.S. TIN	5 Amount of this distribution \$	For Privacy Act and Paperwork Reduction Act Notice, see the Instructions for Form 8288.
Street address, city or town, state or province, country, and ZIP or foreign postal code		6 Other amounts withheld \$	

Form **8288-C** (1-2023)

Cat. No. 73416Q

Attach Copy A to Form 8288

Department of the Treasury - Internal Revenue Service

DO NOT FILE

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WITHHOLDING AGENT'S (PARTNERSHIP'S) name	WITHHOLDING AGENT'S (PARTNERSHIP'S) U.S. EIN	Form 8288-C (January 2023)	
Street address, city or town, state or province, country, and ZIP or foreign postal code		1 Date of transfer (mm/dd/yyyy) / /	
PARTNER'S (TRANSFEREE'S) name subject to withholding	PARTNER'S (TRANSFEREE'S) U.S. TIN	2 Amount realized \$	Copy B For Partner (Transferee) Subject to Withholding
Street address, city or town, state or province, country, and ZIP or foreign postal code		3 Amount withheld \$	
SELLER'S (TRANSFEROR'S) name		4 Date of this distribution (mm/dd/yyyy) / /	
SELLER'S (TRANSFEROR'S) U.S. TIN		5 Amount of this distribution \$	
Street address, city or town, state or province, country, and ZIP or foreign postal code		6 Other amounts withheld \$	

Form **8288-C** (1-2023)

Keep for your records

Department of the Treasury - Internal Revenue Service

DO NOT FILE

Instructions for the Person Subject to Withholding Under Section 1446(f)(4)

Generally, if you are the transferee of a partnership interest from a foreign person and failed to withhold the entire amount required under section 1446(f)(1) or failed to certify to the partnership the extent to which you satisfied your withholding obligation, your partnership will withhold on a distribution to you under section 1446(f)(4) and Regulations section 1.1446(f)-3 and issue you a Form 8288-C.

You may use the Form 8288-C as evidence of the amount of your section 1446(f)(1) liability that you satisfied. If the amount the partnership withholds under section 1446(f)(4) exceeds your section 1446(f)(1) liability, you may be able to claim a refund by attaching Form(s) 8288-C to Form 8288.

Do not use Form 8288-C to claim a credit against your income tax liability or attach it to your income tax return.

See the Instructions for Form 8288, Pub. 515, and Pub. 519 for more information.

**DRAFT AS OF
August 24, 2022
DO NOT FILE**

Distribution number _____		OMB No. 1545-0902	Statement of Withholding Under Section 1446(f)(4) on Dispositions by Foreign Persons of Partnership Interests
WITHHOLDING AGENT'S (PARTNERSHIP'S) name	WITHHOLDING AGENT'S (PARTNERSHIP'S) U.S. EIN	Form 8288-C (January 2023)	
Street address, city or town, state or province, country, and ZIP or foreign postal code		1 Date of transfer (mm/dd/yyyy) / /	
PARTNER'S (TRANSFEREE'S) name subject to withholding	PARTNER'S (TRANSFEREE'S) U.S. TIN	2 Amount realized \$	Copy C For Withholding Agent
Street address, city or town, state or province, country, and ZIP or foreign postal code		3 Amount withheld \$	
		4 Date of this distribution (mm/dd/yyyy) / /	
SELLER'S (TRANSFEROR'S) name	SELLER'S (TRANSFEROR'S) U.S. TIN	5 Amount of this distribution \$	
Street address, city or town, state or province, country, and ZIP or foreign postal code		6 Other amounts withheld \$	

Form **8288-C** (1-2023)

Keep for your records

Department of the Treasury - Internal Revenue Service

DO NOT FILE

Instructions for the Partnership Withholding Under Section 1446(f)(4)

If a foreign person transferred an interest in your partnership and the transferee failed to withhold the entire amount required under section 1446(f)(1) or failed to certify to the partnership the extent to which it satisfied its withholding obligation, the partnership must withhold on each distribution to the transferee under section 1446(f)(4) and Regulations section 1.1446(f)-3 and issue to the transferee a Form 8288-C.

For each distribution, you must prepare a separate Form 8288-C for each transfer subject to withholding under section 1446(f)(4) and Regulations section 1.1446(f)-3. Attach Copy A to Form 8288. Provide Copy B to the partner (transferee) subject to withholding. Retain Copy C for your records.

U.S. taxpayer identification number (TIN). A U.S. taxpayer identification number (TIN) is a(n) social security number (SSN), employer identification number (EIN), or individual taxpayer identification number (ITIN). For more information, see the Instructions for Form 8288.

Address. When providing a foreign address on Form 8288-C, enter the number and street, city or town, state or province, country, and ZIP or foreign postal code. Don't abbreviate the country name. Follow the foreign country's practice in placing the postal code in the address.

Box 1. Enter the date the interest in the partnership was transferred to the transferee whose name appears on this form.

Box 2. Enter the amount realized by the foreign person who transferred its interest in the partnership to the transferee.

Box 3. Enter the federal withholding tax and interest you withheld under section 1446(f)(4) on the distribution to the transferee.

Box 4. Enter the date you made the distribution to the transferee that is subject to withholding.

Box 5. Enter the total amount of the distribution to the transferee.

Box 6. If the distribution was also subject to withholding under another provision of the Code, such as section 1441, enter the amount of withholding under that other provision.

See the Instructions for Form 8288 for more information.

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