



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

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Employer identification number (EIN)

- A** Is the corporation filing this form a member of a controlled group treated as a single employer under sections 59(k)(1)(D) and 52?  Yes  No  
 If "Yes," the corporation must complete Part V listing the names, EINs, and separate company financial statement income or loss for each member of the controlled group treated as a single employer taken into account in the determination of "applicable corporation" under section 59(k)(1)(D).
- B** Is the corporation filing this form a member of a foreign-parented multinational group (FPMG) within the meaning of section 59(k)(2)(B)?  Yes  No  
 If "Yes," the corporation must complete Part V listing the names, EINs, and separate company financial statement income or loss for each member of the FPMG under section 59(k)(2)(B).

**Part I Applicable Corporation Determination** (Report all amounts in U.S. dollars.)  
 If you have already determined in current or prior years you are an applicable corporation, skip Part I and continue to Part II.

	(a) First Preceding Year Ended / /	(b) Second Preceding Year Ended / /	(c) Third Preceding Year Ended / /
<b>1</b> Net income or loss per applicable financial statement(s) (AFS) (see instructions):			
<b>a</b> Consolidated net income or loss per the AFS of the corporation	<b>1a</b>		
<b>b</b> Include AFS net income or loss of other includible entities (add net income and subtract net loss)	<b>1b</b>		
<b>c</b> Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)	<b>1c</b>		
<b>d</b> Adjustment for certain consolidating entries (see instructions)	<b>1d</b>		
<b>e</b> Specified additional net income or loss item B. Reserved for future use	<b>1e</b>		
<b>f</b> AFS net income or loss of all entities in the test group before adjustments. Combine lines 1a through 1d	<b>1f</b>		
<b>2</b> Adjustments (see instructions):			
<b>a</b> Financial statements covering different tax years	<b>2a</b>		
<b>b</b> Corporations that are not included on the taxpayer's consolidated return	<b>2b</b>		
<b>c</b> Aggregate pro-rata share of adjusted net income from controlled foreign corporations (CFCs) for which the corporation is a U.S. shareholder. If zero or less, enter -0- (attach Schedule A (Form 4626)) (see instructions for special rules if completing this form for an FPMG)	<b>2c</b>		
<b>d</b> Amounts that are not effectively connected to a U.S. trade or business (see instructions for special rules if completing this form for an FPMG)	<b>2d</b> ( ) ( ) ( )		
<b>e</b> Certain taxes	<b>2e</b>		
<b>f</b> Patronage dividends and per-unit retain allocations (cooperatives only)	<b>2f</b>		
<b>g</b> Alaska native corporations	<b>2g</b>		
<b>h</b> Certain credits	<b>2h</b>		
<b>i</b> Mortgage servicing income	<b>2i</b>		
<b>j</b> Tax-exempt entities (organizations subject to tax under section 511)	<b>2j</b>		
<b>k</b> Depreciation	<b>2k</b>		
<b>l</b> Qualified wireless spectrum	<b>2l</b>		
<b>m</b> Covered transactions	<b>2m</b>		
<b>n</b> Adjustments related to bankruptcy and insolvency	<b>2n</b>		
<b>o</b> Certain insurance company adjustments	<b>2o</b>		
<b>p</b> Adjustment P—Reserved for future use	<b>2p</b>		
<b>q</b> Adjustment Q—Reserved for future use	<b>2q</b>		
<b>r</b> Adjustment R—Reserved for future use	<b>2r</b>		
<b>s</b> Adjustment S—Reserved for future use	<b>2s</b>		
<b>z</b> Other	<b>2z</b>		
<b>3</b> Specified adjustment. Reserved for future use	<b>3</b>		
<b>4</b> Total adjustments. Combine lines 2a through 2z	<b>4</b>		
<b>5</b> AFSI. Combine lines 1f and 4	<b>5</b>		
<b>6</b> AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 5			<b>6</b>
<b>7</b> 3-year average annual AFSI (see instructions)			<b>7</b>

**Part I** **Applicable Corporation Determination** (Report all amounts in U.S. dollars.) *(continued)*

- 8** Is line 7 more than \$1 billion?
  - Yes.** Continue to line 9.
  - No.** STOP here and attach to your tax return.
- 9** Is the corporation a member of an FPMG within the meaning of section 59(k)(2)(B)?
  - Yes.** Continue to line 10.
  - No.** Continue to Part II.

- 10** AFSI for purposes of the \$100 million test before adjustments:
  - a** AFSI from line 5 . . . . .
  - b** Aggregation differences (see instructions) . . . . .
  - c** Total AFSI for purposes of the \$100 million test before adjustments. Combine lines 10a and 10b . . . . .
- 11** Adjustments:
  - a** Income not effectively connected to a U.S. trade or business . . . . .
  - b** Aggregate pro-rata share of adjusted net income from CFCs for which the corporation is a U.S. shareholder. If zero or less, enter -0- (attach Schedule A (Form 4626)) (see instructions) . . . . .
  - c** Reserved for future use—Other adjustments 1 . . . . .
  - d** Reserved for future use—Other adjustments 2 . . . . .

	(a) First Preceding Year Ended / /	(b) Second Preceding Year Ended / /	(c) Third Preceding Year Ended / /	
<b>10a</b>				
<b>10b</b>				
<b>10c</b>				
<b>11a</b>				
<b>11b</b>				
<b>11c</b>				
<b>11d</b>				
<b>12</b>				
<b>13</b>				
<b>14</b> AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 13 . . . . .				<b>14</b>
<b>15</b> 3-year average annual AFSI for purposes of the \$100 million test . . . . .				<b>15</b>

- 14** AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 13 . . . . .
- 15** 3-year average annual AFSI for purposes of the \$100 million test . . . . .
- 16** Is line 15 \$100 million or more?
  - Yes.** Continue to Part II.
  - No.** STOP here. Attach to your tax return.

**Part II Corporate Alternative Minimum Tax (CAMT)**

1	Net income or loss per AFS (see instructions):	
a	Consolidated net income or loss per the AFS of the corporation	1a
b	Include AFS net income or loss of other includible entities (add net income and subtract net loss)	1b
c	Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)	1c
d	Adjustment for certain consolidating entries (see instructions)	1d
e	Specified additional net income or loss item D. Reserved for future use	1e
f	AFS net income or loss before adjustments. Combine lines 1a through 1d	1f
2	Adjustments (see instructions):	
a	Financial statements covering different tax years	2a
b	Reserved for future use—Adjustment 2b	2b
c	Corporations that are not included on the taxpayer's consolidated return (see instructions)	2c
d	The corporation's distributive share of adjusted financial statement income of partnerships	2d
e	Aggregate pro-rata share of adjusted net income from CFCs for which the corporation is a U.S. shareholder. Enter the amount from Part VI, Section II, line 3	2e
f	Amounts that are not effectively connected to a U.S. trade or business	2f
g	Certain taxes. Enter the amount from Part III, line 7	2g
h	Patronage dividends and per-unit retain allocations (cooperatives only)	2h
i	Alaska native corporations	2i
j	Certain credits	2j
k	Mortgage servicing income	2k
l	Covered benefit plans described in section 56A(c)(11)(B)	2l
m	Tax-exempt entities (organizations subject to tax under section 511)	2m
n	Depreciation	2n
o	Qualified wireless spectrum	2o
p	Covered transactions	2p
q	Adjustments related to bankruptcy and insolvency	2q
r	Certain insurance company adjustments	2r
s	AFSI adjustment S—Reserved for future use	2s
t	AFSI adjustment T—Reserved for future use	2t
u	AFSI adjustment U—Reserved for future use	2u
z	Other	2z
3	Total adjustments. Combine lines 2a through 2z	3
4	AFSI before financial statement net operating loss carryover. Combine lines 1f and 3	4
5	Financial statement net operating loss (FSNOL) (see instructions)	5
6	AFSI. Subtract line 5 from line 4. If zero or less, enter -0-	6
7	Multiply line 6 by 15% (0.15)	7
8	Corporate alternative minimum tax foreign tax credit (CAMT FTC). Enter amount from Part IV, Section I, line 6 (see instructions)	8
9	Tentative minimum tax. Subtract line 8 from line 7. If zero or less, enter -0-	9
10	Regular tax liability (see instructions)	10
11	Base erosion minimum tax (see instructions)	11
12	Combine lines 10 and 11	12
13	Alternative minimum tax. Subtract line 12 from line 9. If zero or less, enter -0-. Enter here and on Form 1120, Schedule J, line 3, or the appropriate line of the corporation's income tax return	13

**Part III Adjustment for Certain Taxes Under Section 56A(c)(5)**

1	Current income tax provision—Foreign	1
2	Current income tax provision—Federal	2
3	Deferred income tax provision—Foreign	3
4	Deferred income tax provision—Federal	4
5	Income taxes included in equity method investment income	5
6a	Adjustment A—Reserved for future use	6a
b	Adjustment B—Reserved for future use	6b
c	Adjustment C—Reserved for future use	6c
d	Adjustment D—Reserved for future use	6d
e	Adjustment E—Reserved for future use	6e
f	Adjustment F—Reserved for future use	6f
g	Adjustment G—Reserved for future use	6g
h	Adjustment H—Reserved for future use	6h
z	Income taxes in other places	6z
7	Total. Combine lines 1 through 6z. Enter here and on Part II, line 2g	7

**Part IV Corporate Alternative Minimum Tax—Foreign Tax Credit**

**Section I—CAMT Foreign Tax Credit**

<b>1</b>	Domestic corporation CAMT foreign income taxes:			
<b>a</b>	Total foreign taxes paid or accrued as reported on Form 1118, Schedule B, Part I, column 2(j)	<b>1a</b>		
<b>b</b>	Adjustment	<b>1b</b>		
<b>c</b>	Adjustment	<b>1c</b>		
<b>d</b>	Adjustment	<b>1d</b>		
<b>e</b>	Adjustment	<b>1e</b>		
<b>f</b>	Adjustment	<b>1f</b>		
<b>g</b>	Adjustment	<b>1g</b>		
<b>2</b>	Total domestic corporation CAMT foreign income taxes. Combine lines 1a through 1g			<b>2</b>
<b>3</b>	Allowable CFC CAMT foreign income taxes:			
<b>a</b>	Pro-rata share of CFC CAMT foreign income taxes from Part IV, Section II, line 11, column (n)	<b>3a</b>		
<b>b</b>	Other	<b>3b</b>		
<b>c</b>	Carryover of excess foreign taxes (from Part IV, Section III, line 4, column (vii))	<b>3c</b>		
<b>d</b>	Total CFC CAMT foreign income taxes. Add lines 3a, 3b, and 3c			<b>3d</b>
<b>e</b>	Percentage specified in section 55(b)(2)(A)(i)	<b>3e</b>	15%	
<b>f</b>	Aggregate pro-rata share of adjusted net income from CFCs for which the corporation is a U.S. shareholder. Enter the amount from Part VI, Section II, line 3 (see instructions)	<b>3f</b>		
<b>g</b>	CFC CAMT FTC limitation (multiply line 3e by line 3f)			<b>3g</b>
<b>h</b>	Allowable CFC CAMT foreign income taxes (lesser of line 3d or line 3g)			<b>3h</b>
<b>4</b>	CAMT FTC Line 4—Reserved for future use			<b>4</b>
<b>5</b>	CAMT FTC Line 5—Reserved for future use			<b>5</b>
<b>6</b>	Total CAMT foreign income taxes. Combine lines 2 and 3h. Enter this amount on Part II, line 8			<b>6</b>

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**Part IV Corporate Alternative Minimum Tax – Foreign Tax Credit** *(continued)*

**Section II – Allowable CFC CAMT Foreign Income Taxes**

	(a) Name of CFC	(b) EIN or reference ID number of CFC	(c) CFC income	(d) Foreign taxes for which credit is allowed	(e) Adjustment	(f) Adjustment
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

11 Total. Combine lines 1 through 10 . . . . .

	(g) Adjustment	(h) Adjustment	(i) Adjustment	(j) Adjustment	(k) Adjustment	(l) Total (combine columns (d) through (k))	(m) Reserved for future use	(n) Pro-rata share of CFC CAMT foreign income taxes (see instructions)
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								

**Part IV Corporate Alternative Minimum Tax—Foreign Tax Credit** *(continued)*

**Section III—CAMT Foreign Tax Credit Carryover for CFCs** (Report all amounts in U.S. dollars.)

Foreign Tax Carryover Reconciliation		(i) 5th Preceding Tax Year	(ii) 4th Preceding Tax Year	(iii) 3rd Preceding Tax Year	(iv) 2nd Preceding Tax Year	(v) 1st Preceding Tax Year	(vi) Current Tax Year	(vii) Total (add columns (i) through (vi))
<b>1</b>	Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Form 4626, Part IV, Section III (see instructions)) . . . . .							
<b>2</b>	Adjustments to line 1 (enter description—see instructions):							
<b>a</b>								
<b>b</b>								
<b>c</b>								
<b>d</b>								
<b>e</b>								
<b>f</b>								
<b>g</b>								
<b>3</b>	Total. Combine lines 2a through 2g . . . . .							
<b>4</b>	Adjusted foreign tax carryover from prior tax year (combine lines 1 and 3). If zero or less, enter -0- . . . . .							
<b>5</b>	Foreign tax carryover used in current tax year (see instructions) . . . . .	( )	( )	( )	( )	( )		( )
<b>6</b>	Foreign tax carryover expired and unused in current tax year (see instructions) . . . . .	( )						( )
<b>7</b>	Foreign tax carryover generated in current tax year (see instructions) . . . . .							
<b>8</b>	Foreign tax carryover to the following tax year. Combine lines 4 through 7. If zero or less, enter -0- . . . . .							

**Part V** Members of a Controlled Group Treated as a Single Employer and FPMG Members Taken Into Account in "Applicable Corporation" Determination

	(a) Name of member	(b) EIN of member	(c) Check if the entity is a member of a 59(k)(1)(D) group	(d) Check if the entity is a member of a 59(k)(2)(B) group	(e) EIN/FTIN of the U.S. return (if any) on which the majority of the member's income is reported	(f) Member's financial statement income/(loss)
1			<input type="checkbox"/>	<input type="checkbox"/>		
2			<input type="checkbox"/>	<input type="checkbox"/>		
3			<input type="checkbox"/>	<input type="checkbox"/>		
4			<input type="checkbox"/>	<input type="checkbox"/>		
5			<input type="checkbox"/>	<input type="checkbox"/>		
6			<input type="checkbox"/>	<input type="checkbox"/>		
7			<input type="checkbox"/>	<input type="checkbox"/>		
8			<input type="checkbox"/>	<input type="checkbox"/>		
9			<input type="checkbox"/>	<input type="checkbox"/>		
10			<input type="checkbox"/>	<input type="checkbox"/>		
11			<input type="checkbox"/>	<input type="checkbox"/>		
12			<input type="checkbox"/>	<input type="checkbox"/>		
13			<input type="checkbox"/>	<input type="checkbox"/>		
14			<input type="checkbox"/>	<input type="checkbox"/>		
15			<input type="checkbox"/>	<input type="checkbox"/>		
16			<input type="checkbox"/>	<input type="checkbox"/>		
17			<input type="checkbox"/>	<input type="checkbox"/>		
18			<input type="checkbox"/>	<input type="checkbox"/>		
19			<input type="checkbox"/>	<input type="checkbox"/>		
20			<input type="checkbox"/>	<input type="checkbox"/>		
21			<input type="checkbox"/>	<input type="checkbox"/>		
22			<input type="checkbox"/>	<input type="checkbox"/>		
23			<input type="checkbox"/>	<input type="checkbox"/>		
24			<input type="checkbox"/>	<input type="checkbox"/>		

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**Part VI Aggregate Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A(c)(3)**  
**Section I—Pro-Rata Share of Adjusted Net Income or Loss of CFCs Described in Section 56A(c)(3)**

	(a) Name of CFC	(b) EIN or reference ID number of the CFC	(c) Country of incorporation (enter country code)	(d) Pro-rata share of adjusted net income or (loss) of the CFC described in section 56A(c)(3)
1				
2				
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12				
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41				
<b>42 Total</b>				<b>42</b>

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**Section II—Section 56A(c)(3)(B) Negative Adjustment**

1	Aggregate pro-rata share of CFCs' adjusted net income or (loss) from the total of Part VI, Section I	<b>1</b>	
2	Available section 56A(c)(3)(B) negative adjustment from preceding year	<b>2</b>	
3	Aggregate pro-rata share of adjusted net income from CFCs for which the corporation is a U.S. shareholder, taking available section 56A(c)(3)(B) negative adjustment into account. Combine line 1 and line 2. If more than zero, enter here and on Part II, line 2e, and Part IV, Section I, line 3f. If zero or less, enter -0- and go to line 4	<b>3</b>	
4	Section 56A(c)(3)(B) negative adjustment to carry over to succeeding year. Combine line 1 and line 2. If less than zero, enter the combined total as a negative number. If zero or more, enter -0-	<b>4</b>	