



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 / / |
|---|---|--|---|
| 1 Net income or loss per applicable financial statement(s) (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 B. Reserved for future use | 1e | | |
| f AFS net income or loss of all entities in the test group before adjustments. Combine lines 1a through 1d | 1f | | |
| 2 Adjustments (see instructions): | | | |
| a Financial statements covering different tax years | 2a | | |
| b Corporations that are not included on the taxpayer's consolidated return | 2b | | |
| c 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) | 2c | | |
| d 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) | 2d () () () | | |
| e Certain taxes | 2e | | |
| f Patronage dividends and per-unit retain allocations (cooperatives only) | 2f | | |
| g Alaska native corporations | 2g | | |
| h Certain credits | 2h | | |
| i Mortgage servicing income | 2i | | |
| j Tax-exempt entities (organizations subject to tax under section 511) | 2j | | |
| k Depreciation | 2k | | |
| l Qualified wireless spectrum | 2l | | |
| m Covered transactions | 2m | | |
| n Adjustments related to bankruptcy and insolvency | 2n | | |
| o Certain insurance company adjustments | 2o | | |
| p Adjustment P—Reserved for future use | 2p | | |
| q Adjustment Q—Reserved for future use | 2q | | |
| r Adjustment R—Reserved for future use | 2r | | |
| s Adjustment S—Reserved for future use | 2s | | |
| z Other | 2z | | |
| 3 Specified adjustment. Reserved for future use | 3 | | |
| 4 Total adjustments. Combine lines 2a through 2z | 4 | | |
| 5 AFSI. Combine lines 1f and 4 | 5 | | |
| 6 AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 5 | | | 6 |
| 7 3-year average annual AFSI (see instructions) | | | 7 |

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 / / |
|--|---|--|---|
| 10a | | | |
| 10b | | | |
| 10c | | | |
| 11a | | | |
| 11b | | | |
| 11c | | | |
| 11d | | | |
| 12 | | | |
| 13 | | | |
| 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 | | | |

- 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

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

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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 | | | | | | |
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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 | | | | | | | | |
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| 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)) |
|--|----------------------------------|-----------------------------------|------------------------------------|-----------------------------------|----------------------------------|-----------------------------|---|
| 1 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)) | | | | | | | |
| 2 Adjustments to line 1 (enter description—see instructions): | | | | | | | |
| a _____ | | | | | | | |
| b _____ | | | | | | | |
| c _____ | | | | | | | |
| d _____ | | | | | | | |
| e _____ | | | | | | | |
| f _____ | | | | | | | |
| g _____ | | | | | | | |
| 3 Total. Combine lines 2a through 2g | | | | | | | |
| 4 Adjusted foreign tax carryover from prior tax year (combine lines 1 and 3). If zero or less, enter -0- | | | | | | | |
| 5 Foreign tax carryover used in current tax year (see instructions) | () | () | () | () | () | | () |
| 6 Foreign tax carryover expired and unused in current tax year (see instructions) | () | | | | | | () |
| 7 Foreign tax carryover generated in current tax year (see instructions) | | | | | | | |
| 8 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"/> | | |
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| 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) |
|----|--------------------|---|---|---|
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| 42 | Total | | | 42 |

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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 | 1 | | |
| 2 | Available section 56A(c)(3)(B) negative adjustment from preceding year | 2 | | |
| 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 | 3 | | |
| 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- | 4 | | |