Form 1120-F

U.S. Income Tax Return of a Foreign Corporation

	5. 5.g., 55. ps. a	
or calendar year 1994, or tax year beginning, 1	994, and ending , 19	4
Con comprete instruct	iono	

OMB No. 1545-0126

Inter	nal Revenue S	Service		► See separate	instructions.			"		Г		
print				Employer identification number								
Please type or	Number, street, and room or suite no. (see instructions) City or town, state and ZIP code, or country			Check applicable bo initial return final return			I return 🔲 am	ended re				
_								│ ing: (1) ☐ Cash (2) ☐ Ac				
	-	•				ethod of accounting the office of the office			<i>i</i> ∟ Ac	ccrual		
				ncome reported on this return	1	corporation file a			Yes	No		
					for the p	receding tax year?)	· · · · ·				
D	The corpor	ration's bo	ooks and records are	e maintained by:		corporation at any						
					1 "	in a trade or busine						
						orporation at any to permanent establi						
					States fo	r purposes of appl	ying secti	on 894(b) and				
F					any app States ar	licable tax treaty nd a foreign count	betweer ry?	n the United				
	the tax yea	If the corporation had an agent in the United States at any time during the tax year, enter:			If "Yes,"	enter the name of	the forei	gn country:				
		Kind of agent Name				corporation a for						
						? (See section 55						
					If "Yes,"	have you filed For	m 5471?	(Sec. 6035).				
F		fer to the list on the last page of the instructions and state the rporation's principal:				L Did the corporation have any transactions with related parties?						
						you may have to		5472 (section				
		_			1	nd section 6038C)						
	(3) Produc	t or servic	e ▶			mber of Forms 54 anal information is r			pages 2	and 5.		
				Computation of Tax D	ue or Overn	aymont	•					
				Computation of tax b	ue or Overp	ayıncın				1		
1												
2				9, page 4			. 2					
3 4				10 on page 5) Schedule PH (Form 1120))—se			. 4					
5		_					5	_				
6	Paymer											
a	1993 ov	erpaymen	t credited to 1994	6a	_							
k	1994 es	timated ta	ix payments	6b								
C			lied for on Form 4466	6c ()	Bal ► 6d 6e							
f			h Form 7004	panies (attach Form 2439)	6f							
ç				Form 4136). See instructions.	6g							
ŀ	•	U.S. income tax paid or withheld at source (add line 12, page 2, and amounts										
	from Fo	rms 8288-	-A and 8805 (attach	Forms 8288-A and 8805))	6h							
i		-	add lines 6d through				_ 6					
7	, , , , , , , , , , , , , , , , , , , ,						□ <u>7</u> 8					
8 9				the total of lines 5 and 7, enter and		 aid	. 9					
10		•	•	dited to 1995 estimated tax ▶	amount overpe	Refunded	▶ 10)				
ΡI	ease	Under pe	nalties of perjury, I declar	are that I have examined this return, in complete. Declaration of preparer (ot	ncluding accompai	nying schedules and s	statements,	and to the best	of my kno	wledge wledge		
	gn	Land belie	., is true, correct, and	osproto. Boolardilon of proparer (of		Sassa on an inform	.a.ioii oi Wi	on propulor nas	any Kilo	ouge.		
	ere	Signati	ure of officer		Date	Title						
_		,	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		Date	ĺ		Preparer's socia	security	number		
Pa		Preparer signature				Check if employe		:				
	eparer's	Firm's na					. No. ▶					
US	e Only	yours it s	self-employed) —			711	code ►					

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SECTION I.—Certain Gains, Profits, and Income From U.S. Sources That Are NOT Effectively Connected With the Conduct of a Trade or Business in the United States (See instructions.)

If you are required to complete Section II or are using Form 1120-F as a claim for refund of tax withheld at source, include below **ALL** income from U.S. sources that is **NOT** effectively connected with the conduct of a trade or business in the United States. Otherwise, include only those items of income on which the U.S. income tax was not fully paid at the source. The rate of tax on each item of **gross** income listed below is 30% (4% for the gross transportation tax) or such lower rate specified by tax treaty. No deductions are allowed against these types of income. Fill in treaty rates where applicable. **If the corporation claimed a lower treaty rate, also complete Item W, page 5**.

Na	me of treaty country, if any ▶									
	(a) Nature of income	Gro	(b) ss inco	me		(c) Rate of tax (%)	(d) Amount of tax	Amount of U paid or withhe		
1	Interest									
2	Dividends									
3	Rents									
4	Royalties									
5	Annuities									
6	Gains from disposal of timber, coal, or domestic iron ore with a retained economic interest (attach supporting schedule)									
7	Gains from sale or exchange of patents, copyrights, etc									
8	Fiduciary distributions (attach supporting schedule)									
9	Gross transportation income (see instructions)					4				
10	Other fixed or determinable annual or periodic gains, profits, and income									
11	Total. Enter here and on line 1, page 1									
12	Total. Enter here and include on line 6h	, page 1.								
Ad	ditional Information Required (conti	inued fro	m pa	age 1)					
М	Is the corporation a personal holding company section 542 for definition.).	/? (See	Yes	No	s		le NOL carryover from pric it by any deduction or		Yes	No
N	Is the corporation a controlled foreign corpo (See section 957 for definition.)	ration?			т	page 3) ►	n a subsidiary in a parent			
	Is the corporation a personal service corporation instructions for definition.).	n? (See				controlled group	?			
Р	Enter tax-exempt interest received or accrued the tax year (see instructions) ▶	during				number of the p	arent corporation ▶			
Q	Did the corporation at the end of the tax year directly or indirectly, 50% or more of the voting of a U.S. corporation? (See section 267(c) for rattribution.)	ar own, g stock rules of			U	trust at the end indirectly, 50%	al, partnership, corporation of the tax year own, or more of the corporation tion 267(c) for attribution	directly or on's voting		
	If "Yes," attach a schedule showing (1) nan identifying number of such U.S. corporation; (2) percowned; and (3) taxable income or (loss) before N special deductions of such U.S. corporation for the ending with or within your tax year.	ne and centage OL and				identifying numb already entered	schedule showing the per. (Do not include any i	nformation		
	If the corporation has an NOL for the tax year electing to forego the carryback period, of here				N	ote: Additional inf	ormation is required at th	e bottom of p	page 5.	

Form 1120-F (1994) SECTION II.—Income Effectively Connected With the Conduct of a Trade or Business in the United States (See instructions.) **IMPORTANT**—Fill in all applicable lines and schedules. If you need more space, see **Attachments** in the General Instructions. **1a** Gross receipts or sales ______ **b** Less returns and allowances ______ **c** Bal ▶ Gross profit (subtract line 2 from line 1c) Income 8 Capital gain net income (attach Schedule D (Form 1120)) Net gain or (loss) from Form 4797, Part II, line 20 (attach Form 4797) 12 Compensation of officers (Schedule E, line 4). Deduct only amounts connected with a U.S. business ctions for limitations on deductions.) Rents 18 Interest deduction allowable under Regulations section 1.882-5 Charitable contributions (see instructions for 10% limitation) . 21 Less depreciation claimed on Schedule A and elsewhere on return 21

딅	24 Advertising	24	
ij.	25 Pension, profit-sharing, etc., plans	25	
ee	26 Employee benefit programs	26	
(5)	27 Other deductions (see instructions—attach schedule)	27	
ö	28 Total deductions. Add lines 12 through 27	28	
덛	29 Taxable income before NOL deduction and special deductions (subtract line 28 from line 11) .	29	
Deductions (See instru	30 Less: a Net operating loss deduction		
۵	b Special deductions (Schedule C, line 15) 30b	30c	
	31 Taxable income or (loss). Subtract line 30c from line 29	31	1
<u> </u>			
20	chedule A Cost of Goods Sold (See instructions.)		
1	Inventory at beginning of year	1	
2	Purchases	2	
3	Cost of labor	3	
4	Additional section 263A costs (see instructions—attach schedule)	4	
5	Other costs (attach schedule)	5	
6	Add lines 1 through 5	6	
7	Inventory at end of year	7	
8	Cost of goods sold. Subtract line 7 from line 6. Enter here and on Section II, line 2	8	
	Check all methods used for valuing closing inventory:		
	Cost		
	Lower of cost or market as described in Regulations section 1.471-4		
	☐ Writedown of subnormal goods as described in Regulations section 1.471-2(c)		
	☐ Other (Specify method used and attach explanation.) ►		
k	c Check if the LIFO inventory method was adopted this tax year for any goods		
	If checked, attach Form 970.		_
	: If the LIFO inventory method was used for this tax year, enter percentage (or amounts) of closing		
Ì	inventory computed under LIFO	9c	
c	Do the rules of section 263A (for property produced or acquired for resale) apply to the corpora	ition? □ Yes □	□No
	Was there any change in determining quantities, cost, or valuations between opening and closing		No
	If "Yes," attach explanation.	, : 50	

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Sc	chedule C Dividends and Speci	ial Deductions (See	instructions.)	(a) Divider	nds ,	1. 0/	(c) Special deductions:
	Dividends from less-than-20%-owned			received		b) %	(a) × (b)
	subject to the 70% deduction (other the					70	
	Dividends from 20%-or-more-owned						
	subject to the 80% deduction (other the				80 see		
	Dividends on debt-financed stock of domestic a				ructions 42		
	Dividends on certain preferred stock of le Dividends on certain preferred stock of 2	·	I			48	
	Dividends from less-than-20%-owned	·					
	subject to the 70% deduction					70	
	Dividends from 20%-or-more-owned for		are subject			80	
8	Total. Add lines 1 through 7. See instru	ections for limitation.					
	Other dividends from foreign corporation		3, 6, and 7				
	Foreign dividend gross-up (section 78)						
	IC-DISC and former DISC dividends not include the second state of the second se	ded on lines 1, 2, or 3 (sec	tion 246(d))				
	Other dividends	nreferred stock of a n					
	Total dividends. Add lines 1 through 12.						
15	Total deductions. Add lines 8 and 13. Er						
So	Compensation of O Complete Schedule E onl					3) are	\$500,000 or more.
	(a) Name of officer	(b) Social security	(c) Percent of time devoted	Percent of stock	corporation owned		(f) Amount of
	(a) Name of officer	number	to business	(d) Common	(e) Preferred		compensation
_1			%		%	+	
			% %	% %	% %	+	
			% %	%	%	+	
			%		%	+	
			%		%	+	
			%	%	%)	
2							
3 4	Compensation of officers claimed of Subtract line 2 from line 2. Enter the						
	Subtract line 3 from line 2. Enter the chedule J Tax Computation (S		ille 12, page .	J			
1	Check if the corporation is a member	, , , , , , , , , , , , , , , , , , ,	(see sections	: 1561 and 15	63) ▶ □		
22	If the box on line 1 is checked, en		•		•		
	\$9,925,000 taxable income bracket			φου ₁ ουο, φ2ο	,000, and		
	(1) \(\\$ \) (2)	\$	(3) \$				
b		I do		1 1			
	(1) Additional 5% tax (not more that						
•	(2) Additional 3% tax (not more that	·	nd naman:!	ondos as	otion (s		
3	Income tax. Check this box if the c page 15 of the instructions) ▶ □			ervice corpor	ation (see	3	
4a				a			
b				b			
C	: Check: Nonconventional source	e fuel credit					
	☐ QEV credit (attach Form	·	40	C			
C	General business credit. Enter here and						
	□ 3800 □ 3468 □ 588 □ 8586 □ 8830 □ 882		☐ 6765 ☐ 8844				
	☐ 8845 ☐ 8846 ☐ 884°		40	d			
e	0 111 6 1 1 1 1 1 1		40	е			
5	Total credits. Add lines 4a through	4e				5	
6	Subtract line 5 from line 3					6	
7	Recapture taxes. Check if from:					7	
8a						8a 8b	
9	Total tax under section 882(a). Ad					9	

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	CTION III.—Branch Profits Tax and Tax on Excess Interest (See instructions.)				
Pa	rt I—Branch Profits Tax				
1 2	Enter the amount from Section II, line 29	1			
_	instructions and attach a schedule showing the nature and amount of adjustments.)	3			
3	Effectively connected earnings and profits. Combine line 1 and line 2. Enter the result here	4a			
4a	Enter U.S. net equity at the end of the current tax year. (Attach schedule.)	4b			
	line 4a. Enter the result here and skip to line 4e	4c			
C	Decrease in U.S. net equity. If line 4b is greater than line 4a, subtract line 4a from line 4b. Enter the result here	4d			
€	Non-previously taxed accumulated effectively connected earnings and profits. Enter excess, if any, of effectively connected earnings and profits for preceding tax years beginning after 1986 over any dividend equivalent amounts for those tax years	4e			
5	Dividend equivalent amount. Subtract line 4c from line 3. Enter the result here. If zero or less, enter -0 If no amount is entered on line 4c, add the lesser of line 4d or line 4e to line 3 and enter the total here	5			
6	Branch profits tax . Multiply line 5 by 30% (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). Enter here and include on line 3, page 1. (See instructions.) Also complete Items W and X below	6			
Pa	rt II—Tax on Excess Interest			Т	
	Enter the interest from Section II, line 18	7a			
k	Enter the interest apportioned to the effectively connected income of the foreign corporation	7b			
,	that is capitalized or otherwise nondeductible	7c			
8	Enter the branch interest (including capitalized and other nondeductible interest). (See				
Ü	instructions for definition.) If the interest paid by the foreign corporation's U.S. trade or				
	business was increased because 80% or more of the foreign corporation's assets are U.S.				
0.	assets, check this box	9a			
	Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0	74			
	Otherwise, enter -0 (See instructions.).	9b			
c	Subtract line 9b from line 9a	9c			
10	Tax on excess interest. Multiply line 9c by 30% or lower treaty rate (if the corporation is a qualified resident or otherwise qualifies for treaty benefits). Enter here and include on line 3,				
	page 1. (See instructions.) Also complete Items W and X below	10			
Add	litional Information Required (continued from page 2)			N	
	Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to: W Is the corporation taking a position that a U.S. tax treaty overrules Internal Revenue law of the	or modifies an	Yes	No	
	(1) A complete termination of all U.S. trades or businesses?	tax?			
	(2) The tax-free liquidation or reorganization of a foreign corporation?	ty-based return			
	(3) The tax-free incorporation of a U.S. trade or business?	ce for purposes			
	If (1) applies or (2) applies and the transferee is domestic, attach Form 8848. of computing its branch profits tax and expension interest tax, check the basis for that claim				
	If (3) applies, attach the statement required by Regulations section 1.884-2T(d)(5). Stock ownership and base eros	ion test		. \square	
	Regulations section 1.004 21(d)(d).			. \square	
				. 🛚	
	Private letter ruling			<u>. L</u>	

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	Additional schedules to be completed for Section II or Section III (See instructions.)						
Sc	hedule L Balance Sheets	Balance Sheets Beginning of tax year			End of tax year		
	ASSETS	(a)	(b)	(c)	(d)		
1	Cash						
	Trade notes and accounts receivable						
	Less allowance for bad debts	()		()			
	Inventories						
4	U.S. government obligations			-			
	Tax-exempt securities (see instructions)			-			
	Other current assets (attach schedule)			-			
	Loans to stockholders			-			
	Mortgage and real estate loans			-			
	Other investments (attach schedule).			-			
	Buildings and other fixed depreciable assets						
		((
	Less accumulated depreciation	7		/			
	Depletable assets	((
	Less accumulated depletion	,		,			
	Land (net of any amortization)						
	Intangible assets (amortizable only) .	(1			
	Less accumulated amortization)			
14	Other assets (attach schedule)			_			
	Total assets						
	BILITIES AND STOCKHOLDERS' EQUITY						
	Accounts payable			-	<u> </u>		
	Mtges., notes, bonds payable in less than 1 year			-	l		
	Other current liabilities (attach schedule)			-	l		
	Loans from stockholders			_	<u> </u>		
	Mtges., notes, bonds payable in 1 year or more			_	l		
	Other liabilities (attach schedule)						
22	Capital stock: a Preferred stock						
	b Common stock						
	Paid-in or capital surplus			_			
24	Retained earnings—Appropriated (attach schedule)			-			
25	Retained earnings—Unappropriated .		,	-			
	Less cost of treasury stock		()	-	()		
	Total liabilities and stockholders' equity						
No	te: The corporation is not required to	o complete Schedu	les M-1 and M-2 b	elow if the total as	sets on Schedule L,		
	15, column (d) are less than \$25,00						
Sc	hedule M-1 Reconciliation of Inc	come or (Loss) per	Books With Inco	me per Return			
1	Net income (loss) per books		7 Income recorde	d on books this year			
2	Federal income tax			this return (itemize):			
3	Excess of capital losses over capital gains			erest. \$			
4	Income subject to tax not recorded on						
	books this year (itemize):		8 Deductions on th	nis return not charged			
				ome this year (itemize):			
5	Expenses recorded on books this year			\$			
·	not deducted on this return (itemize):			ryover \$			
а	Depreciation \$						
	Contributions carryover \$			8			
	Travel and entertainment \$						
6	Add lines 1 through 5		line 9				
Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Schedule L, line 25)							
1	Balance at beginning of year	_		Cash	•		
2	Net income (loss) per books			Stock	•		
3	Other increases (itemize):			Property			
J	·			s (itemize):			
				ough 6			
1	Add lines 1 2 and 3			vear (line 4 less line 7)			