

Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

▶ See separate instructions.

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| Name of shareholder | Identifying number (see page 3 of instructions) |
| Number, street, and room or suite no. (If a P.O. box, see page 3 of instructions.) | Your tax year: calendar year or other tax year beginning and ending |
| City or town, state, and ZIP code or country | |
| Check type of shareholder filing the return: <input type="checkbox"/> Individual <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> S Corporation <input type="checkbox"/> Nongrantor Trust <input type="checkbox"/> Estate | |
| Name of passive foreign investment company (PFIC) or qualified electing fund (QEF) | Employer identification number (if any) |
| Address (Enter number, street, city or town, and country.) | Tax year of company or fund: calendar year or other tax year beginning and ending |

Part I Elections (See instructions.)

- A** I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. (Section 1295.) *Complete lines 1a through 2c of Part II.*
- B** I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. (Section 1291(d)(2)(A).) *Enter gain or loss on line 10f of Part IV.*
- C** I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. (Section 1291(d)(2)(B).) *Enter this amount on line 10e.*
- D** I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. (Section 1294.) *Complete lines 3a through 4c of Part II to calculate the tax that may be deferred.*
Note: *If any portion of line 1a or line 2a of Part II is includible under section 551 or 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.*
- E** I, a shareholder of a former PFIC, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC, or, if I qualify, my share of the PFIC's post-1986 earnings and profits deemed distributed, on the last day of its last tax year as a PFIC under section 1297(a). (Section 1298(b)(1).) *Enter excess distribution on line 10e or 10f of Part IV.*
- F** I, a shareholder of a PFIC, elect to mark-to-market the stock of that PFIC, which stock is marketable within the meaning of section 1296(e). (Section 1296.) *Complete Part III.*

Part II Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 1a through 2c. If you are making Election D, also complete lines 3a through 4c. (See page 5 of instructions.)

| | | | | |
|---|-----------|--|-----------|--|
| 1a Enter your pro rata share of the ordinary earnings of the QEF | 1a | | | |
| b Enter the portion of line 1a that is included in income under section 551 or 951 or that may be excluded under section 1293(g) | 1b | | | |
| c Subtract line 1b from line 1a. Enter this amount on your tax return as dividend income | | | 1c | |
| 2a Enter your pro rata share of the total net capital gain of the QEF | 2a | | | |
| b Enter the portion of line 2a that is included in income under section 551 or 951 or that may be excluded under section 1293(g) | 2b | | | |
| c Subtract line 2b from line 2a. This amount is a net long-term capital gain. Enter this amount in Part II of the Schedule D used for your income tax return. (See page 5 of instructions.) | | | 2c | |
| 3a Add lines 1c and 2c | | | 3a | |
| b Enter the total amount of cash and the fair market value of other property distributed or deemed distributed to you during the tax year of the QEF. (See page 5 of instructions.) | 3b | | | |
| c Enter the portion of line 3a to the extent not already included in line 3b that is attributable to shares in the QEF that you disposed of, pledged, or otherwise transferred during the tax year | 3c | | | |
| d Add lines 3b and 3c | | | 3d | |
| e Subtract line 3d from line 3a, and enter the difference (if zero or less, enter amount in brackets) | | | 3e | |
| Important: <i>If line 3e is greater than zero, and no portion of line 1a or 2a is includible in income under section 551 or 951, you may make Election D with respect to the amount on line 3e.</i> | | | | |
| 4a Enter the total tax for total taxable income for the tax year | 4a | | | |
| b Enter the total tax for the tax year determined without regard to the amount entered on line 3e | 4b | | | |
| c Subtract line 4b from line 4a. This is the deferred tax, the time for payment of which is extended by making Election D. See instructions. | | | 4c | |

Part III Income or (Loss) From Mark-to-Market Election (See page 5 of instructions.)

| | | | |
|---|---|---|--|
| 5 | Enter the fair market value of your PFIC stock at the end of the tax year | 5 | |
| 6 | Enter your adjusted basis in the stock at the end of the tax year | 6 | |
| 7 | Excess. Subtract line 6 from line 5. If a gain, stop here. Include this amount as ordinary income on your tax return. If a loss, go to line 8 | 7 | |
| 8 | Enter any unreversed inclusions (as defined in section 1296(d)) | 8 | |
| 9 | Enter the smaller of line 7 or line 8. Include this amount as an ordinary loss on your tax return | 9 | |

Part IV Distributions and Disposition of Stock in a Section 1291 Fund (See page 6 of instructions.)
Complete a separate Part IV for each excess distribution.

| | | | |
|-----|---|-----|--|
| 10a | Enter your total distributions from the PFIC during the current tax year. If the holding period of the PFIC stock began in the current tax year, this amount is dividend income to the extent there are accumulated earnings and profits | 10a | |
| b | Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the company for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year) | 10b | |
| c | Divide line 10b by 3. (See instructions if the number of preceding tax years is less than 3.) | 10c | |
| d | Multiply line 10c by 125%. Enter the lesser of line 10a or line 10d as a dividend on your income tax return | 10d | |
| e | Subtract line 10d from line 10a. This amount, if more than zero, is the total excess distribution. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part IV. See instructions if you received more than one distribution during the current tax year | 10e | |
| f | Enter gain or loss from the disposition of stock of a section 1291 fund or former section 1291 fund. If a gain, complete line 11. If a loss, show it in brackets and do not complete line 11 | 10f | |
| 11a | On an attached statement for each distribution and disposition, show your holding period for each share of stock or block of shares held. Allocate the excess distribution to each day in your holding period. Add all amounts that are allocated to days in each tax year. | | |
| b | Enter the total of the amounts determined in line 11a that are allocable to the current tax year and tax years before the foreign corporation became a PFIC (pre-PFIC tax years). Enter these amounts on your income tax return as other income | 11b | |
| c | Enter the aggregate increases in tax (before credits) for each tax year in your holding period (other than the current tax year and pre-PFIC years). (See instructions.) | 11c | |
| d | Foreign tax credit. (See instructions.) | 11d | |
| e | Subtract line 11d from line 11c. Enter this amount on your income tax return as "additional tax." (See instructions.) | 11e | |
| f | Determine interest on each net increase in tax determined on line 11e using the rates and methods of section 6621. Enter the aggregate amount of interest here. (See instructions.) | 11f | |

Part V Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election. Complete lines 9 and 10 only if there is a partial termination of the section 1294 election.

| | (i) | (ii) | (iii) | (iv) | (v) | (vi) |
|---|-------|-------|-------|-------|-------|-------|
| 1 Tax year of outstanding election | | | | | | |
| 2 Undistributed earnings to which the election relates | | | | | | |
| 3 Deferred tax | | | | | | |
| 4 Interest accrued on deferred tax (line 3) as of the filing date | | | | | | |
| 5 Event terminating election | | | | | | |
| 6 Earnings distributed or deemed distributed during the tax year | | | | | | |
| 7 Deferred tax due with this return | | | | | | |
| 8 Accrued interest due with this return. | | | | | | |
| 9 Deferred tax outstanding after partial termination of election | | | | | | |
| 10 Interest accrued after partial termination of election | | | | | | |

