

Form **5471**
(Rev. December 2023)

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

OMB No. 1545-0123

Go to www.irs.gov/Form5471 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by section 896) (see instructions) beginning , 20 , and ending , 20

Attachment
Sequence No. **121**

Name of person filing this return **A** Identifying number

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address) **B** Category of filer (See instructions. Check applicable box(es).):
 1a 1b 1c 2 3 4 5a 5b 5c

City or town, state, and ZIP code **C** Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period %

Filer's tax year beginning , 20 , and ending , 20

D Check box if this is a final Form 5471 for the foreign corporation

E Check if any excepted specified foreign financial assets are reported on this form (see instructions)

F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40

G If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)

H Person(s) on whose behalf this information return is filed

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars

Form 5471 Practice Guide

**William Hoffman, Public Education
Committee William Hoffman, Bill
Raabe, Jim Smith, David Maloney**

Form 5471 Practice Guide:

A Practical Guide to U. S. Taxation of International Transactions Robert Meldman, Michael S. Schadewald, 1997
Discusses two fundamental principles of US taxation of international transactions i e tax jurisdiction and the source of income rules Explains how the US taxes the foreign activities of domestic corporations US citizens and other US persons Includes chapters on the foreign tax credit the deemed paid foreign tax credit transfer pricing controlled foreign corporations foreign sales corporations and income tax treaties Describes how the US taxes the US activities of foreign corporations non resident alien individuals and other foreign persons

A Practical Guide to U.S. Taxation of International Transactions Robert E. Meldman, Michael Schadewald, 2000-06-22 This book discusses basis principles tax jurisdiction source of income rules U S taxation of foreign income foreign tax credit transfer pricing anti avoidance provisions governing foreign corporations foreign sales corporations foreign currency translation and transactions tax treaties planning of foreign operations and U S taxation of foreign persons foreign persons investing in the U S and foreign persons doing business in the U S

Practical Guide to U.S. Transfer Pricing Robert T. Cole, 1999 Practical Guide to U S Transfer Pricing is a total approach to U S transfer pricing For The complex global marketplace No book on the market today offers you a more thorough approach to transfer pricing rules that Practical Guide to U S Transfer Pricing The tremendous increase in international trade among the nations of the world has made transfer pricing the most important international tax issues for governments Thus it is a major problem for major multinational corporations which are subject to detriments from transfer pricing rules and adjustments especially double taxation penalties And The cost of compliance Packed with ready to use guidelines detailed examples and useful tips Practical Guide to U S Transfer Pricing has been specifically designed to help you make today s transfer pricing rules work for your corporation The book brings together For The first time a wealth of features that will empower you to deal quickly and efficiently with all transfer pricing issues and problems You will find Unsurpassed coverage of U S transfer pricing substantive rules Incisive comparisons of the U S rules To The international accepted OECD Transfer Pricing Guidelines Information on both special and traditional procedures for transfer pricing cases Comprehensive explanations of all major transfer pricing methods such as the Comparable Uncontrolled Price Method Cost Plus Method Comparable Profits Methods and Profit Split Method Criteria for choosing the best transfer pricing method Ideas on how to cope with the U S rules in light of foreign requirements A checklist that multinationals can use in developing an international strategy for transfer pricing compliance A full description of the proposed method of global trading of financial products

Study Guide to Accompany Wft Corporations, Partnerships, Estates and Trusts 1999 William Hoffman, Public Education Committee William Hoffman, Bill Raabe, Jim Smith, David Maloney, 1998-05-19 Written specifically for the student who needs help understanding the difficult concepts in the Corporations Partnerships Estates Trust Taxation course The Study Guide contains a chapter review of key concepts and self evaluation tests

An Introductory Guide to

EC Competition Law and Practice Valentine Korah,1994 **Monthly Catalog of United States Government Publications** ,1988 IRS Practice & Policy ,1990 *How to Be a Global Nonprofit* Lisa Norton,2013-02-25 Solid guidance for the complex legal issues faced by international nonprofits When a nonprofit operates across borders whether by making grants or directly operating programs the interaction among legal requirements of two or more countries quickly becomes highly complex How To Be A Global Nonprofit fills a need for legal and practical guidance for nonprofit organizations with international activities and includes ten case studies to provide insights into the ways real organizations have dealt with various legal and practical issues Along the way it skillfully explores alternatives for advancing a nonprofit mission across borders while also looking at the legal and practical issues nonprofits encounter as they work internationally Includes ten case studies based on interviews with large and small international nonprofits Offers a realistic sense of the complexity of legal and practical issues global nonprofits face Features a companion website with a variety of online tools and materials related to key concepts discussed in this book Not long ago international philanthropy was the province of large organizations like the Red Cross UNICEF and Save the Children This has radically changed How to Be a Global Nonprofit thoroughly explores the legal and practical issues nonprofits encounter as they work internationally and the resources required to deal with them *Practice Set for West Federal Taxation 2006* Hoffman/Raabe/Smith/Maloney,2005-05 These practice sets by Donald R Trippeer Colorado State University Pueblo are comprehensive and designed to be completed after the related materials have been covered Complete with tax forms and instructions they provide a realistic and challenging experience to accompany the text Solutions are available to instructors only **Monthly Catalogue, United States Public Documents** ,1995 **Asset Protection Planning Guide** Barry S. Engel,2000 Labor Policy and Practice: Labor relations Bureau of National Affairs (Arlington, Va.),1953 The New Walford Ray Lester,2005 Covers 15 broad subject groupings social sciences generic psychology sociology social work politics government law finance accountancy industries business education sport media information and tools for information professionals **Practical Engineer** ,1909 *Foreign Investment in U.S. Real Estate* ,1990 *Catalogue of Copyright Entries* Library of Congress. Copyright Office,1917 **The Electrical Journal** ,1913 **Standard Federal Tax Reports** ,1996 **The Publishers' Trade List Annual** ,1985 *United States Tax Reporter* ,1990

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