

**Return by a U.S. Transferor of Property
 to a Foreign Corporation
 (under section 367)**

Part I U.S. Transferor Information (see instructions)

| | |
|--------------------|--|
| Name of transferor | Identification number (see instructions) |
|--------------------|--|

Number, street, and room or suite no. (If a P.O. box, see instructions.)

City or town, state, and ZIP code

1 The following questions apply only if the transferor is a corporation:

- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or fewer domestic corporations? Yes No
- b** Did the transferor remain in existence after the transfer? Yes No
 If not, list the controlling shareholder(s) and their identification number(s):

| Controlling shareholder | Identification number |
|-------------------------|-----------------------|
| | |
| | |
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| | |

- c** If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes No
 If not, list the name and employer identification number (EIN) of the parent corporation:

| Name of parent corporation | EIN of parent corporation |
|----------------------------|---------------------------|
| | |

2 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), list the name and EIN of the transferor's partnership:

| Name of partnership | EIN of partnership |
|---------------------|--------------------|
| | |

Part II Transferee Foreign Corporation Information (see instructions)

| | |
|---|--|
| 3 Name of transferee (foreign corporation) | 4 Identification number, if any |
|---|--|

5 Address (including country)

| | |
|--|--|
| 6 Place of organization or creation | 7 Foreign law characterization (see instructions) |
|--|--|

8 Is the transferee foreign corporation a controlled foreign corporation? Yes No

Part III Information Regarding Transfer of Property (see instructions)

| | |
|---------------------------|---|
| 9 Date of transfer | 10 Type of nonrecognition transaction (see instructions) |
|---------------------------|---|

11 Description of property transferred:

12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? **Yes** **No**

13 Was the transferor required to recognize income under Temporary Regulations sections 1.367(a)-4T through 1.367(a)-6T (e.g., for tainted property, depreciation recapture, branch loss recapture, etc.)? **Yes** **No**

14a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred pursuant to the transaction? **Yes** **No**

b If yes, describe the nature of the rights to the intangible property that was transferred in the transfer:

| | | | | |
|---------------------------------|---|---------------|---|--------------------------------------|
| Please Sign Here | Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. | | | |
| | ▶ _____ Signature | _____ Date | ▶ _____ Title | |
| Paid Preparer's Use Only | Preparer's signature ▶ _____ | Date _____ | Check if self-employed <input type="checkbox"/> | Preparer's social security no. _____ |
| | Firm's name (or yours if self-employed), and address ▶ _____ | | EIN ▶ _____ | : _____ |
| | | | ZIP code ▶ _____ | |

