



**Note:** *The draft you are looking for begins on the next page.*

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Name \_\_\_\_\_ Employer identification number \_\_\_\_\_

- 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 / /
<b>1</b> Net income or loss per applicable financial statement(s) (AFS) (see instructions):			
<b>a</b> Consolidated net income or loss per the AFS of the corporation	<b>1a</b>		
<b>b</b> Include AFS net income or loss of other includible entities (add net income and subtract net loss)	<b>1b</b>		
<b>c</b> Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)	<b>1c</b>		
<b>d</b> Specified additional net income or loss item A. Reserved for future use	<b>1d</b>		
<b>e</b> Specified additional net income or loss item B. Reserved for future use	<b>1e</b>		
<b>f</b> AFS net income or loss of all entities in the test group before adjustments. Combine lines 1a through 1c	<b>1f</b>		
<b>2</b> Adjustments:			
<b>a</b> Financial statements covering different tax years	<b>2a</b>		
<b>b</b> Corporations that are not included on the taxpayer's consolidated return (see instructions)	<b>2b</b>		
<b>c</b> Pro-rata share of net income from controlled foreign corporations for which the corporation is a U.S. shareholder. If zero or less, enter -0- (see instructions for special rules if completing this form for an FPMG)	<b>2c</b>		
<b>d</b> 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)	<b>2d</b> ( )	( )	( )
<b>e</b> Certain taxes (see instructions)	<b>2e</b>		
<b>f</b> Patronage dividends and per-unit retain allocations (cooperatives only)	<b>2f</b>		
<b>g</b> Alaska native corporations	<b>2g</b>		
<b>h</b> Certain credits (see instructions)	<b>2h</b>		
<b>i</b> Mortgage servicing income	<b>2i</b>		
<b>j</b> Tax-exempt entities (organizations subject to tax under section 511)	<b>2j</b>		
<b>k</b> Depreciation	<b>2k</b>		
<b>l</b> Qualified wireless spectrum	<b>2l</b>		
<b>m</b> Covered transactions	<b>2m</b>		
<b>n</b> Adjustments related to bankruptcy and insolvency	<b>2n</b>		
<b>o</b> Certain insurance company adjustments	<b>2o</b>		
<b>p</b> Adjustment P—Reserved for future use	<b>2p</b>		
<b>q</b> Adjustment Q—Reserved for future use	<b>2q</b>		
<b>r</b> Adjustment R—Reserved for future use	<b>2r</b>		
<b>s</b> Adjustment S—Reserved for future use	<b>2s</b>		
<b>z</b> Other (see instructions)	<b>2z</b>		
<b>3</b> Specified adjustment. Reserved for future use	<b>3</b>		
<b>4</b> Total adjustments. Combine lines 2a through 2z	<b>4</b>		
<b>5</b> AFSI. Combine lines 1f and 4	<b>5</b>		
<b>6</b> AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 5	<b>6</b>		
<b>7</b> 3-year average annual AFSI (see instructions)	<b>7</b>		

**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** Pro-rata share of CFC net income described in section 56A(c)(3) (attach worksheet) (see instructions) . . . . .
  - c** Reserved for future use—Other adjustments 1 . . . . .
  - d** Reserved for future use—Other adjustments 2 . . . . .
- 12** Total adjustments. Combine lines 11a and 11b . . . . .
- 13** Total AFSI for purposes of the \$100 million test. Combine lines 10c and 12 . . . . .

	(a) First Preceding Year Ended / /	(b) Second Preceding Year Ended / /	(c) Third Preceding Year Ended / /
<b>10a</b>			
<b>10b</b>			
<b>10c</b>			
<b>11a</b>			
<b>11b</b>			
<b>11c</b>			
<b>11d</b>			
<b>12</b>			
<b>13</b>			

- 14** AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 13 . . . . . **14**
- 15** 3-year average annual AFSI for purposes of the \$100 million test . . . . . **15**
- 16** Is line 15 \$100 million or more?
  - Yes.** Continue to Part II.
  - No.** STOP here. Attach to your tax return.

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DRAFT  
November 15, 2023

**Part II Corporate Alternative Minimum Tax**

<b>1</b>	Net income or loss per applicable financial statement(s) (AFS) (see instructions):	
<b>a</b>	Consolidated net income or loss per the AFS of the corporation	<b>1a</b>
<b>b</b>	Include AFS net income or loss of other includible entities (add net income and subtract net loss)	<b>1b</b>
<b>c</b>	Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)	<b>1c</b>
<b>d</b>	Specified additional net income or loss item C. Reserved for future use	<b>1d</b>
<b>e</b>	Specified additional net income or loss item D. Reserved for future use	<b>1e</b>
<b>f</b>	AFS net income or loss before adjustments. Combine lines 1a through 1c	<b>1f</b>
<b>2</b>	Adjustments:	
<b>a</b>	Financial statements covering different tax years	<b>2a</b>
<b>b</b>	Reserved for future use—Adjustment 2b	<b>2b</b>
<b>c</b>	Corporations that are not included on the taxpayer's consolidated return (see instructions)	<b>2c</b>
<b>d</b>	The corporation's distributive share of adjusted financial statement income of partnerships	<b>2d</b>
<b>e</b>	Pro-rata share of net income from controlled foreign corporations for which the corporation is a U.S. shareholder. If zero or less, enter -0-. (See instructions)	<b>2e</b>
<b>f</b>	Amounts that are not effectively connected to a U.S. trade or business	<b>2f</b>
<b>g</b>	Certain taxes. Enter the amount from Part III, line 7	<b>2g</b>
<b>h</b>	Patronage dividends and per-unit retain allocations (cooperatives only)	<b>2h</b>
<b>i</b>	Alaska native corporations	<b>2i</b>
<b>j</b>	Certain credits (see instructions)	<b>2j</b>
<b>k</b>	Mortgage servicing income	<b>2k</b>
<b>l</b>	Covered benefit plans described in section 56A(c)(11)(B)	<b>2l</b>
<b>m</b>	Tax-exempt entities (organizations subject to tax under section 511)	<b>2m</b>
<b>n</b>	Depreciation	<b>2n</b>
<b>o</b>	Qualified wireless spectrum	<b>2o</b>
<b>p</b>	Covered transactions	<b>2p</b>
<b>q</b>	Adjustments related to bankruptcy and insolvency	<b>2q</b>
<b>r</b>	Certain insurance company adjustments	<b>2r</b>
<b>s</b>	AFSI adjustment S—Reserved for future use	<b>2s</b>
<b>t</b>	AFSI adjustment T—Reserved for future use	<b>2t</b>
<b>u</b>	AFSI adjustment U—Reserved for future use	<b>2u</b>
<b>z</b>	Other (see instructions)	<b>2z</b>
<b>3</b>	Total adjustments. Combine lines 2a through 2z	<b>3</b>
<b>4</b>	AFSI before financial statement net operating loss carryover. Combine lines 1f and 3	<b>4</b>
<b>5</b>	Financial statement net operating loss (FSNOL) (see instructions)	<b>5</b>
<b>6</b>	AFSI. Subtract line 5 from line 4. If zero or less, enter -0-	<b>6</b>
<b>7</b>	Multiply line 6 by 15% (0.15)	<b>7</b>
<b>8</b>	Corporate alternative minimum tax foreign tax credit (CAMT FTC). Enter amount from Part IV, Section I, line 6 (see instructions)	<b>8</b>
<b>9</b>	Tentative minimum tax. Subtract line 8 from line 7. If zero or less, enter -0-	<b>9</b>
<b>10</b>	Regular tax liability (see instructions)	<b>10</b>
<b>11</b>	Base erosion minimum tax (see instructions)	<b>11</b>
<b>12</b>	Combine lines 10 and 11	<b>12</b>
<b>13</b>	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	<b>13</b>

**Part III Adjustment for Certain Taxes Under Section 56A(c)(5)**

<b>1</b>	Current income tax provision—Foreign	<b>1</b>
<b>2</b>	Current income tax provision—Federal	<b>2</b>
<b>3</b>	Deferred income tax provision—Foreign	<b>3</b>
<b>4</b>	Deferred income tax provision—Federal	<b>4</b>
<b>5</b>	Income taxes included in equity method investment income	<b>5</b>
<b>6a</b>	Adjustment A—Reserved for future use	<b>6a</b>
<b>b</b>	Adjustment B—Reserved for future use	<b>6b</b>
<b>c</b>	Adjustment C—Reserved for future use	<b>6c</b>
<b>d</b>	Adjustment D—Reserved for future use	<b>6d</b>
<b>e</b>	Adjustment E—Reserved for future use	<b>6e</b>
<b>f</b>	Adjustment F—Reserved for future use	<b>6f</b>
<b>g</b>	Adjustment G—Reserved for future use	<b>6g</b>
<b>h</b>	Adjustment H—Reserved for future use	<b>6h</b>
<b>z</b>	Income taxes in other places	<b>6z</b>
<b>7</b>	Total. Combine lines 1 through 6z. Enter here and on Part II, line 2g	<b>7</b>

**Part IV Alternative Minimum Tax—Corporations Foreign Tax Credit**

**Section I—AMT Foreign Tax Credit**

<b>1</b>	Domestic corporation AMT foreign income taxes:			
<b>a</b>	Total foreign taxes paid or accrued as reported on Form 1118, Schedule B, Part I, column 2(j)	<b>1a</b>		
<b>b</b>	Adjustment	<b>1b</b>		
<b>c</b>	Adjustment	<b>1c</b>		
<b>d</b>	Adjustment	<b>1d</b>		
<b>e</b>	Adjustment	<b>1e</b>		
<b>f</b>	Adjustment	<b>1f</b>		
<b>g</b>	Adjustment	<b>1g</b>		
<b>2</b>	Total domestic corporation AMT foreign income taxes. Combine lines 1a through 1g			<b>2</b>
<b>3</b>	Allowable controlled foreign corporation (CFC) AMT foreign income taxes:			
<b>a</b>	Pro-rata share of CFC AMT foreign income taxes from Part IV, Section II, line 11, column (n)	<b>3a</b>		
<b>b</b>	Carryover of excess foreign taxes (from Part IV, Section III, line 4, column (vii))	<b>3b</b>		
<b>c</b>	Total CFC AMT foreign income taxes. Add lines 3a and 3b			<b>3c</b>
<b>d</b>	Percentage specified in section 55(b)(2)(A)(i)	<b>3d</b>	15%	
<b>e</b>	Pro-rata share of CFC net income described in section 56A(c)(3) (attach worksheet) (see instructions)	<b>3e</b>		
<b>f</b>	CFC AMT foreign tax credit limitation (multiply line 3d by line 3e)			<b>3f</b>
<b>g</b>	Allowable CFC AMT foreign income taxes (lesser of line 3c or line 3f)			<b>3g</b>
<b>4</b>	CAMT FTC Line 4—Reserved for future use			<b>4</b>
<b>5</b>	CAMT FTC Line 5—Reserved for future use			<b>5</b>
<b>6</b>	Total AMT foreign income taxes. Combine lines 2 and 3g. Enter this amount on Part II, line 8			<b>6</b>

NOVEMBER 15, 2023

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**Part IV Alternative Minimum Tax—Corporations Foreign Tax Credit** *(continued)*

**Section II—Allowable CFC AMT 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						
3						
4						
5						
6						
7						
8						
9						
10						

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) Pro-rata share percentage	(n) Pro-rata share of CFC AMT foreign income taxes (multiply column (l) by column (m))
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								

**Part IV Alternative Minimum Tax—Corporations Foreign Tax Credit** *(continued)*

**Section III—AMT Foreign Tax Credit Carryover for Controlled Foreign Corporations** (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))
<b>1</b> 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)) . . . . .							
<b>2</b> Adjustments to line 1 (enter description—see instructions):							
<b>a</b> _____							
<b>b</b> _____							
<b>c</b> _____							
<b>d</b> _____							
<b>e</b> _____							
<b>f</b> _____							
<b>g</b> _____							
<b>3</b> Total. Combine lines 2a through 2g . . . . .							
<b>4</b> Adjusted foreign tax carryover from prior tax year (combine lines 1 and 3). If zero or less, enter -0- . . . . .							
<b>5</b> Foreign tax carryover used in current tax year (see instructions) . . . . . ( ) ( ) ( ) ( ) ( ) ( ) ( )							
<b>6</b> Foreign tax carryover expired and unused in current tax year (see instructions) . . . . . ( ) ( ) ( ) ( ) ( ) ( ) ( )							
<b>7</b> Foreign tax carryover generated in current tax year (see instructions) . . . . .							
<b>8</b> 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 Foreign-Parented Multinational Group (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"/>		
2			<input type="checkbox"/>	<input type="checkbox"/>		
3			<input type="checkbox"/>	<input type="checkbox"/>		
4			<input type="checkbox"/>	<input type="checkbox"/>		
5			<input type="checkbox"/>	<input type="checkbox"/>		
6			<input type="checkbox"/>	<input type="checkbox"/>		
7			<input type="checkbox"/>	<input type="checkbox"/>		
8			<input type="checkbox"/>	<input type="checkbox"/>		
9			<input type="checkbox"/>	<input type="checkbox"/>		
10			<input type="checkbox"/>	<input type="checkbox"/>		
11			<input type="checkbox"/>	<input type="checkbox"/>		
12			<input type="checkbox"/>	<input type="checkbox"/>		
13			<input type="checkbox"/>	<input type="checkbox"/>		
14			<input type="checkbox"/>	<input type="checkbox"/>		
15			<input type="checkbox"/>	<input type="checkbox"/>		
16			<input type="checkbox"/>	<input type="checkbox"/>		
17			<input type="checkbox"/>	<input type="checkbox"/>		
18			<input type="checkbox"/>	<input type="checkbox"/>		
19			<input type="checkbox"/>	<input type="checkbox"/>		
20			<input type="checkbox"/>	<input type="checkbox"/>		
21			<input type="checkbox"/>	<input type="checkbox"/>		
22			<input type="checkbox"/>	<input type="checkbox"/>		
23			<input type="checkbox"/>	<input type="checkbox"/>		
24			<input type="checkbox"/>	<input type="checkbox"/>		

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