

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



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Almost every form and publication has a page on IRS.gov with a friendly shortcut. For example, the Form 1040 page is at [IRS.gov/Form1040](https://www.irs.gov/Form1040); the Pub. 501 page is at [IRS.gov/Pub501](https://www.irs.gov/Pub501); the Form W-4 page is at [IRS.gov/W4](https://www.irs.gov/W4); and the Schedule A (Form 1040/SR) page is at [IRS.gov/ScheduleA](https://www.irs.gov/ScheduleA). If typing in a link above instead of clicking on it, be sure to type the link into the address bar of your browser, not a Search box.

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If you have comments on reducing paperwork and respondent (filer) burden, with respect to draft or final forms, please respond to the relevant information collection through the Federal Register process; for more info, click [here](#).

Inclusion of Deferred Foreign Income Upon Transition to Participation Exemption System

▶ Attach to tax return.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

For calendar year 20 , or other tax year beginning , 20 , and ending , 20 , of the filer.
Name of person filing this return Identifying number

Note: Throughout this form, the term "2020 tax year" refers to 2020 calendar tax years and fiscal tax years of the person filing this return that begin in 2020.

Part I Section 965(a) Inclusion

1	Reserved	1	
2	Reserved	2	
3	2020 tax year section 965(a) inclusions from pass-throughs. Enter the sum here and on your tax return as follows. Corporations: Enter the line 3 total on Form 1120, Schedule C, line 15, column (a), or the corresponding line of other corporate tax returns. All others: See instructions ▶	3	
4	Reserved	4	
5	Reserved	5	
6	Reserved ▶	6	

Part II Section 965(c) Deduction

7	Reserved	7	
8	Reserved		
9	Reserved	9	
10	Reserved	10	
11	Reserved	11	
12	Reserved		
13	Reserved	13	
14	Reserved	14	
15	Reserved	15	
16	Reserved	16	
17	2020 tax year section 965(c) deduction from pass-throughs. Enter the sum here and on your tax return as follows. Corporations: Enter the line 17 total on Form 1120, Schedule C, line 15, column (c), or the corresponding line of other corporate tax returns. All others: See instructions	17	

Part III Elections

		Yes	No
A	Was an election made to pay the net tax liability over 8 years as provided for in section 965(h)?		
B	Complete if a shareholder in an S corporation. Was an election made to defer payment of net tax liability as provided for in section 965(i)?		
C	Complete if a Real Estate Investment Trust. Was an election made to include income over 8 years as provided for in section 965(m)?		
D	Was an election made not to apply a net operating loss deduction as provided in section 965(n)?		
E	Was the election provided for in Regulations section 1.965-2(f)(2) made?		