## (Rev. December 2023)

Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts

OMB No. 1545-0159

Depa	artment of the Treasury nal Revenue Service	Go to	www.irs.gov/Form3520 for instru	ections and the latest informa	ation.			
Not	Note: All information must be in English. Show all amounts in U.S. dollars. File a separate Form 3520 for each foreign trust.							
For	calendar year 20	, or tax year be	ginning	, 20 , ending		, 20		
Α	Check appropriate b	appropriate boxes:  Initial return Final return Amended return						
В	Check box that appli	ies to person filing i	return: Individual	Partnership Corporatio	on 🗌 Trust	Executor		
С	Check if any excepte	ed specified foreign	financial assets are reported on the	is form. See instructions				
Che	ck all applicable bo	xes. See applicable	e instructions.					
	You are (a) a U.S. transferor who, directly or indirectly, transferred money or other property during the current tax year to a foreign trust; (b) a U.S. person who (1) during the current tax year, transferred property (including cash) to a related foreign trust (or a person related to the trust) in exchange for an obligation, or (2) holds a qualified obligation from the trust that is currently outstanding; or (c) the executor of the estate of a U.S. decedent and (1) the decedent made a transfer to a foreign trust by reason of death, (2) the decedent was treated as the owner of any portion of a foreign trust immediately prior to death, or (3) the decedent's estate included any portion of the assets of a foreign trust. Complete all applicable identifying information requested below and Part I of the form.							
	You are a U.S. owne requested below an		n of a foreign trust at any time duri <b>m.</b>	ng the tax year. Complete all a	applicable identify	ing information		
	You are (a) a U.S. person (including a U.S. owner) or an executor of the estate of a U.S. person who, during the current tax year, received, directly or indirectly, a distribution from a foreign trust; (b) a U.S. person who is a U.S. owner or beneficiary of a foreign trust and in the current tax year, you or a U.S. person related to you received (1) a loan of cash or marketable securities, directly or indirectly, from such foreign trust, or (2) the uncompensated use of trust property; or (c) a U.S. person who is a U.S. owner or beneficiary of a foreign trust and in the current tax year such foreign trust holds an outstanding qualified obligation of yours or a U.S. person related to you. Complete all applicable identifying information requested below and Part III of the form.							
	identifying informat	ion requested bel	current tax year, received certain go bw and Part IV of the form.					
1a Name of U.S. person(s) with respect to whom this Form 3520 is being filed (see instructions)				<b>b</b> Taxpayer ider	tification number (TIN)			
	c Number, street, and room or suite no. If a P.O. box, see instructions.				d Spouse's TIN			
	e City or town		f State or province	g ZIP or foreign postal code	h Country			
	i If you are filing w	vith your spouse a c	current-year joint income tax return	and a joint Form 3520, check	this box	П		
	j If an automatic 2	-month extension a	applies for the U.S. person's tax re	urn, check this box and attach	statement. See in	structions		
	k If an extension w	as requested for th	e tax return, check this box a	nd enter the form number of th	e tax return to be f	iled:		
2	2a Name of foreign trust (if applicable)				<b>b</b> Employer identification number (EIN), if any			
	c Number, street, and room or suite no. If a P.O. box, see instructions.				d Date foreign trust was created			
	e City or town		f State or province	g ZIP or foreign postal code	h Country			
3	-		gent (defined in the instructions) wh	-		ation? Yes No		
3					<b>b</b> TIN, if any			
	c Number, street, and room or suite no. If a P.O. box, see instructions.							
	<b>d</b> City or town		e State or province	f ZIP or postal code	g Country			
4	a Name of U.S. dec	J.S. decedent (see instructions) <b>b</b> Address		c TIN of decede	ent			
	d Date of death	Date of death		e EIN of estate				
	f Check applicable box.  U.S. decedent made transfer to a foreign trust by reason of death.  U.S. decedent treated as owner of foreign trust immediately prior to death.  Assets of foreign trust were included in estate of U.S. decedent.							

Page 2 Form 3520 (Rev. 12-2023) Transfers by U.S. Persons to a Foreign Trust During the Current Tax Year (see instructions) 5a Name of trust creator **b** Address c TIN, if any **b** Country code of country whose law governs the trust Country code of country where trust was created c Date trust was created Will any person (other than the foreign trust) be treated as the owner of the transferred assets after the transfer? 7a Yes No (v) b (iv) Name of foreign Relevant Code Country of residence TIN, if any trust owner section Was the transfer a completed gift or bequest? If "Yes," see instructions . . . . . . No 8 Now or at any time in the future, can any part of the income or corpus of the trust benefit any U.S. beneficiary? No If "No," could the trust be revised or amended to benefit a U.S. beneficiary? ☐ No 10 Reserved for future use Schedule A—Obligations of a Related Trust (see instructions) During the current tax year, did you transfer property (including cash) to a related foreign trust in exchange for an obligation Yes No of the trust or an obligation of a person related to the trust? See instructions If "Yes," complete the rest of Schedule A, as applicable. If "No," go to Schedule B. Were any of the obligations you received (with respect to a transfer described in line 11a above) qualified obligations? . . . No If "Yes," complete the rest of Schedule A and attach a copy of each loan document entered into with respect to each qualified obligation reported on line 11b. If these documents have been attached to a Form 3520 filed within the previous 3 years, attach only relevant updates. If "No," go to Schedule B. (ii) (iii) (iv) Date of transfer giving rise to obligation Maximum term Yield to maturity FMV of obligation 12 With respect to each qualified obligation you reported on line 11b, do you agree to extend the period of assessment of any income or transfer tax attributable to the transfer, and any consequential income tax changes for each year that the obligation is outstanding, to a date 3 years after the maturity date of the obligation? Yes No Note: You have the right to refuse to extend the period of limitations or limit this extension to a mutually agreed-upon issue(s) or mutually agreed-upon period of time. Generally, if you refuse to extend the period of limitations with respect to each qualified obligation you reported on line 11b, then such obligation is not a qualified obligation and you cannot check "Yes" to the question on line 11b. Schedule B—Gratuitous Transfers (see instructions) During the current tax year, did you make any transfers (directly or indirectly) to the trust and receive less than FMV, or no 13 consideration at all, for the property transferred? \_\_ Yes If "Yes," complete columns (a) through (i) below and the rest of Schedule B, as applicable. When completing columns (a) through (i) with respect to each nonqualified obligation, enter -0- in column (h). If "No," go to Schedule C. (a) (b) (d) (c) (e) (a) Description Excess, if any, FMV of property U.S. adjusted Gain recognized Description FMV of property Excess of Date of transfer of property transferred basis of at time of of column (c) of property received column (c) over transferred property transfer, over the sum of received, column (h) transferred if any columns (d) and (e) if any **Totals** If you have a sale or loan document in connection with a transfer reported on line 13, complete 14a through 14c and attach the relevant 14 document(s). If these documents have been attached to a Form 3520 filed within the previous 3 years, attach only relevant updates. Attached Year Are you attaching a copy of any of the following? Yes No Previously Attached Sale document 

Subsequent variances to original sale or loan documents

Form 3520 (Rev. 12-2023)

## Part I Schedule B—Gratuitous Transfers (continued)

**Note:** Complete lines 15 through 18 only if you are required to complete Part I and answered "No" to line 3, acknowledging that the foreign trust did not appoint a U.S. agent to provide the IRS with all relevant trust information.

15		a) peneficiary	<b>(b)</b> Address of beneficiary			(c) U.S. beneficiary?		(d) TIN, if any	
						Yes	No		_
									_
									_
40									
16		a) f trustee	(b) Address of trustee					(c) TIN, if any	
									_
									_
		-)			T				
17	Name of of	a) ther person	(b) Address of other person		(c) Description	8	(d) TIN, if any		
	with trus	st powers	, adi oso oi oilloi poloi	2000			_		
									_
									_
									_
If you checked "No" on line 3, you are required to attach a copy of all trust documents as indicated below. If these documents has attached to a Form 3520-A or Form 3520 filed within the previous 3 years, attach only relevant updates.								nts have be	er
						Atta	ched	Year	
	•	ning a copy of any of the	· ·	Yes No	Previ	ously	Attached		
а	•	-	ments and understandings re	lating to the trust	.	Ĺ	╣ -		_
b	Trust instrume				.	L	╣ -		_
C		or letters of wishes			.	L	╣ -		_
d						╣ -		_	
e f	Trust financial				. 📙 📙	L	╡ -		_
- 1			ocuments		·	structi	ons)		_
19	Did you, at an	ny time during your tax y	ear, hold an outstanding obli	gation of a related foreign to	rust (or a person re	elated to			_
	trust) that you reported as a qualified obligation in the current tax year?								No
<b>(a)</b> Date of original obligation		(b) Tax year qualified obligation first reported	(c) Amount of principal payments made during your tax year	(d) Amount of interest payments made during your tax year	Balance of the outstanding obligation at the end		st CI	(f) bes the obligation still meet the criteria for a alified obligation?	
							Yes	s No	
									_
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Form **3520** (Rev. 12-2023)

Form 3520 (Rev. 12-2023) Page 4 U.S. Owner of a Foreign Trust (see instructions) Part II (e) Relevant Code (a) Name of foreign 20 (c) Address Country of tax residence TIN, if any trust owner section Country code of country where foreign trust was created **b** Country code of country whose law governs the trust **c** Date foreign trust was created 22 Did the foreign trust file Form 3520-A for the current tax year? . . . If "Yes," attach the Foreign Grantor Trust Owner Statement you received from the foreign trust. If "No," to the best of your ability, complete and attach a substitute Form 3520-A for the foreign trust. See instructions for information on penalties for failing to complete and attach a substitute Form 3520-A. 23 Enter the gross value of the portion of the foreign trust that you are treated as owning at the end of your tax year . Distributions to a U.S. Person From a Foreign Trust During the Current Tax Year (see instructions) Part III Note: If you received an amount from a portion of a foreign trust of which you are treated as the owner, only complete lines 24 and 27. Enter cash amounts or FMV of property received, directly or indirectly, during your current tax year, from the foreign trust (exclude loans and uncompensated use of trust property included on line 25). (c) (a) (b) (d) (e) (f) FMV of property received Date of distribution Description of property received Description of property FMV of property Excess of column (c) (determined on date transferred, if any transferred over column (e) of distribution) Total 25 During your current tax year, did you (or a person related to you) receive a loan or uncompensated use of trust property from a Yes If "Yes," complete columns (a) through (g) below for each such loan or use of trust property. Note: See instructions for additional information, including how to complete columns (a) through (g) for use of trust property. (a) (d) (f) Amount treated as Is the obligation a Maximum term of FMV of loan proceeds Date of original Interest rate FMV of qualified distribution from the trust qualified obligation? repayment of of obligation (subtract column (f) or property transaction obligation obligation Yes No from column (a)) 26 With respect to each obligation you reported as a qualified obligation on line 25, do you agree to extend the period of assessment of any income or transfer tax attributable to the transaction, and any consequential income tax changes for each year that the obligation is outstanding, to a date 3 years after the maturity date of the obligation? . Yes No Note: You have the right to refuse to extend the period of limitations or limit this extension to a mutually agreed-upon issue(s) or mutually agreed-upon period of time. Generally, if you refuse to extend the period of limitations with respect to an obligation that you reported as a qualified obligation on line 25, then such obligation is not a qualified obligation and you cannot check "Yes" in column (e) of line 25. 27 Total distributions received during your current tax year. Add line 24, column (f), and line 25, column (g) . . . . . Did the trust, at any time during the current tax year, hold an outstanding obligation of yours (or a person related to you) that ☐ No \_\_ Yes you reported as a qualified obligation? If "Yes," complete columns (a) through (f) below for each obligation. (f) Does the loan still (d) (a) (e) Tax year qualified Balance of the outstanding Date of original Amount of principal payments Amount of interest payments meet the criteria of a obligation first obligation at the end loan transaction made during your tax year made during your tax year qualified obligation? reported of the tax year No

Form 3520 (Rev. 12-2023) Page 5 Distributions to a U.S. Person From a Foreign Trust During the Current Tax Year (continued) Part III Did you receive a Foreign Grantor Trust Beneficiary Statement from the foreign trust with respect to a distribution?  $\square$  Yes  $\square$  No ■ N/A 29 If "Yes," attach the statement and do not complete the remainder of Part III with respect to that distribution. If "No," complete Schedule A with respect to that distribution. Also, complete Schedule C if you enter an amount greater than zero on line 37. If a foreign non-grantor trust, check "N/A." 30 If "Yes," attach the statement and complete either Schedule A or Schedule B below. See instructions. Also, complete Schedule C if you enter an amount greater than zero on line 37 or line 41a. If "No," complete Schedule A with respect to that distribution. Also, complete Schedule C if you enter an amount greater than zero on line 37. If a foreign grantor trust, check "N/A." Schedule A-Default Calculation of Trust Distributions (see instructions) 31 Enter amount from line 27 31 32 Number of years the trust has been a foreign trust, including the current tax year 33 Enter total distributions received from the foreign trust during the 3 preceding tax years (or during the number of years the trust has been a foreign trust, if fewer than 3 years, but excluding the current tax year) . . . . 33 34 Average distribution. Divide line 34 by 3.0 (or the number of years the trust has been a foreign trust, if fewer 35 35 36 36 Amount treated as ordinary income earned in the current tax year. Enter the smaller of line 31 or line 35 . . . 37 Amount treated as accumulation distribution. Subtract line 36 from line 31. If zero, do not complete the rest of Part III 37 Applicable number of years of trust. Divide line 32 by 2.0 and enter the result here 38 38 Schedule B—Actual Calculation of Trust Distributions (see instructions) 39 Enter amount from line 27 40a Amount treated as ordinary income in the current tax year . . . . . . . . . . . . 40a 40b Amount treated as accumulation distribution. If zero, do not complete Schedule C below . . . . . . . . . . . . 41a 41a Amount treated as net short-term capital gain in the current tax year  $\,\cdot\,\,$  .  $\,\cdot\,\,$  . 42a 42a Amount treated as net long-term capital gain in the current tax year . . . . С 42c d 43 43 44 Enter any other distributed amount received from the foreign trust not included on lines 40a. 41a. 42a. 42b. and 43. (Attach explanation.) 44 45 45 46 Amount of foreign trust's weighted undistributed net income . . . . . . . 47 Applicable number of years of trust. Divide line 46 by line 45 and enter the result Schedule C—Calculation of Interest Charge (see instructions) 

Enter tax on total accumulation distribution from line 28 of Form 4970. (Attach Form 4970—see instructions.) .

Combined interest rate imposed on the total accumulation distribution (see instructions) . . . . . . . . . . . .

Interest charge. Multiply the amount on line 49 by the combined interest rate on line 51 . . . . . . . . . . . .

Tax attributable to accumulation distributions. Add lines 49 and 52. Enter here and as "additional tax" on your

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Form <b>3520</b> (Rev. 12-2023)						

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Form 3520 (Rev. 12-2023) Page 6 U.S. Recipients of Gifts or Bequests Received During the Current Tax Year From Foreign Persons (see instructions) Part IV During your current tax year, did you receive more than \$100,000 that you treated as gifts or bequests from a nonresident 54 alien (including a distribution received from a domestic trust treated as owned by a foreign person) or a foreign estate? See Yes No If "Yes," complete columns (a) through (c) with respect to each such gift or bequest in excess of \$5,000. If more space is needed, attach a statement. (b) (a) (c) FMV of property received Date of gift or bequest Description of property received **Total** During your current tax year, did you receive amounts from a foreign corporation or a foreign partnership that you treated as Yes No gifts in excess of the amount provided in the instructions? See instructions regarding related donors . . . . . . If "Yes," complete columns (a) through (g) with respect to each such gift. If more space is needed, attach a statement.

Address of foreign donor

(b)

Name of foreign donor

(a) Date of gift

Check the box that applies to the foreign donor			(f) Description of property received				(g) FMV of property received		
Corporation Partnership		Partnership		эсприон от ргорога	, , , , , , , , , , , , , , , , , , , ,		o. p. op o,		
		any reason to believe that ominee or intermediary for a						5   No	
Sign Here		ties of perjury, I declare that I hand belief, it is true, correct, and		iding any accompa	nying reports, sch	edules, or statements, a	and to the best of	i my	
	Signature		Title			Date			
Paid		e preparer's name	Preparer's signature		Date	Check if self-employed	PTIN		
Prepa Use O	L Cirron's roo	I Firmale manage			•	Firm's EIN	•		
0000		Firm's address				Phone no.			

Form **3520** (Rev. 12-2023)

(d) TIN, if any

(g)