

Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund

▶ See separate instructions.

Name of shareholder	Identifying number (see instructions)
Number and street	Enter your tax year: Calendar year 19 . Other tax year beginning 19 and ending 19 .
City or town, state, and ZIP code or country	
Check type of shareholder filing the return: <input type="checkbox"/> individual <input type="checkbox"/> corporation <input type="checkbox"/> partnership <input type="checkbox"/> S corporation <input type="checkbox"/> nongrantor trust <input type="checkbox"/> estate	
Name of passive foreign investment company or qualified electing fund	Employer identification number (if any)
Address (Enter number, street, city or town, and country.)	Tax year of Company or Fund: Calendar year 19 . Other tax year beginning 19 and ending 19 .

Part I Elections

- 1 I, a shareholder on the first day of the first tax year of a passive foreign investment company as a qualified electing fund, elect to recognize gain on the deemed sale of my interest in the company on that date.
Gain is treated as an excess distribution. Determine your tax liability in Part III; enter the amount of gain on line 9f. If the deemed sale results in a loss, enter the loss in brackets on line 9f. The loss is shown for information purposes only.
See section 1291(d)(2)(A) and Temporary Regulations section 1.1291-10T(d) for information that must be submitted when making this election.
- 2 I, a shareholder on the first day of the first tax year of a passive foreign investment company as a qualified electing fund that is a controlled foreign corporation, elect to treat an amount equal to the post-1986 earnings and profits attributable to the stock as an excess distribution under section 1291.
Enter this amount on line 9e. Only use tax years beginning after 1986 to determine the years over which the excess distribution is allocated in line 10a. See section 1291(d)(2)(B).
- 3 I, a shareholder of a qualified electing fund, elect to extend the time for payment of tax on the undistributed earnings and profits of the fund until terminated. See section 1294(c) and (f) and Temporary Regulations section 1.1294-1T(e) for termination events.
See Temporary Regulations section 1.1294-1T(d)(2) for information that must be submitted when making this election.
- 4 I, a shareholder of a former passive foreign investment company, as described in section 1297(b)(1), elect to recognize gain on the deemed sale of my interest in the company as of the last day of the last tax year as a passive foreign investment company.
Gain is treated as an excess distribution. Determine your tax liability in Part III; enter the gain on line 9f. If the deemed sale results in a loss, enter the loss in brackets on line 9f. The loss is shown for information purposes only.
See Temporary Regulations section 1.1297-3T(b)(2) for information that must be submitted when making this election.

Part II Income From a Qualified Electing Fund (QEF). All QEF shareholders complete lines 5a through 6c. Those making the line 3 election also complete lines 7a through 8c. See the instructions for additional information that must be attached to Form 8621.

5a Enter your pro rata share of the ordinary earnings of the QEF	5a	
5b Enter the portion of line 5a that is included in income under section 551 or 951 or that may be excluded under section 1293(g)	5b	
5c Subtract line 5b from line 5a. Enter this amount on your tax return as "other income"	5c	
6a Enter your pro rata share of the net capital gain of the QEF.	6a	
6b Enter the portion of line 6a that is included in income under section 551 or 951 or that may be excluded under section 1293(g)	6b	
6c Subtract line 6b from line 6a. This amount is long-term capital gain. Enter this amount in Part II of the Schedule D used for your income tax return	6c	
7a Add lines 5c and 6c	7a	
7b Enter the total amount of cash and the fair market value of other property distributed or deemed distributed to you during the tax year of the QEF	7b	
7c Enter the portion of line 7a to the extent not already included in line 7b that is attributable to shares in the QEF that you disposed of, pledged, or otherwise transferred during the tax year	7c	
7d Add lines 7b and 7c	7d	
7e Subtract line 7d from line 7a, and enter the difference (but not less than zero) here If any portion of line 5a or 6a is includible under section 551 or 951, you may not make the line 3 election. If no portion of line 5a or line 6a is includible in income under section 551 or 951 and line 7e is greater than zero, you may make the line 3 election with respect to the amount on line 7e.	7e	
Computation of Amount of Tax the Time for Payment of Which Is Extended		
8a Enter the total tax for total taxable income for the tax year	8a	
b Enter the total tax for the tax year determined without regard to the amount entered on line 7e	8b	
c Subtract line 8b from line 8a. This is the deferred tax, the time for payment of which is extended by making the line 3 election. See instructions	8c	

Part III Distributions and Disposition of Stock in a Nonqualified Fund (See instructions.)

9a Enter the total amount of distributions made to you by the passive foreign investment company during the tax year. If the holding period of the stock began in the tax year, enter this amount as a dividend on your tax return. See instructions	9a	
b Enter the total amount of distributions, reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B), made by the company for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)	9b	
c Divide the amount on line 9b by 3 (but see instructions if the number of preceding tax years is less than 3)	9c	
d Multiply the amount on line 9c by 125%. Enter the lesser of line 9a or line 9d as a dividend on your income tax return	9d	
e Subtract line 9d from line 9a. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part III. The amount on line 9e, if more than zero, is the total excess distribution. See instructions if you received more than one distribution during the tax year	9e	
f Enter the gain realized on the disposition of your interest in the nonqualified fund, which is treated as an excess distribution	9f	
10 On an attached statement for each distribution and disposition, show your holding period for each share of stock or block of shares held and:		
a Allocate the excess distribution to each day in your holding period. Add all amounts that are allocated to days in each tax year.		
b Enter the total of the amounts determined in line 10a that are allocable to the current tax year and tax years before the foreign corporation became a passive foreign investment company (prePFIC tax years). Enter these amounts on your income tax return as "other income"	10b	
c To determine the increase in tax for each tax year in your holding period (other than the current tax year and prePFIC years), multiply the amount allocated to each tax year by the highest rate of tax under section 1 or section 11, whichever is applicable, in effect for that tax year. Enter the aggregate increases in taxes (before credits) here	10c	
d Foreign tax credit. See instructions	10d	
e Subtract the amount on line 10d from the amount on line 10c. Enter this amount on your income tax return as "additional tax." See instructions	10e	
f Determine interest on each net increase in tax (increase in tax less any foreign tax credit) determined in line 10e by using the rates and method contained in section 6621 and enter the aggregate amount of interest here. See instructions	10f	

Part IV Status of Section 1294 Elections and Termination of Section 1294 Elections

Complete a separate column for each outstanding election.

	(i)	(ii)	(iii)	(iv)	(v)	(vi)
1 Tax year of outstanding election	-----, 19-----	-----, 19-----	-----, 19-----	-----, 19-----	-----, 19-----	-----, 19-----
2 Undistributed earnings to which the election relates						
3 Deferred tax						
4 Interest accrued as of the filing date						
5 Event terminating election						
6 Earnings distributed or deemed distributed during the tax year						
7 Deferred tax due with this return						
8 Accrued interest due with this return						
Complete lines 9 and 10 only if there is a partial termination of the section 1294 election						
9 Portion of deferred tax outstanding after partial termination of section 1294 election						
10 Portion of interest accrued after partial termination of section 1294 election						