Form **5471**

Information Return of U.S. Persons With Respect To Certain Foreign Corporations

OMB No. 1545-0704

(Rev. December 2012)		or more inform	ation about Form	E471 000	-	rm 5171			
Department of the Treesury			ation about Form		-		ired by	Attachn	nent
Department of the Treasury Internal Revenue Service	section 898) (see		0 1	, 20	, and ending	,	, 20		nce No. 121
Name of person filing this re	eturn			A Ident	ifying number				
Number, street, and room or su	uite no (or P.O. box nu	mber if mail is not de	alivered to street address	s) B Cater	gory of filer (See in	structions Ch	eck applicat	hle hox(es))	
Number, street, and room or st		mber in mains not de			1 (repealed			_ `_	
City or town, state, and ZIP	code			C Enter	the total percenta				
					k you owned at the				%
Filer's tax year beginning		, 20	, and ending			, 20			
D Person(s) on whose beha	alf this information re	turn is filed:					(1) (1)		
(1) Nam	е		(2) Address		(3) Identify	ing number		neck applica	
							Shareholder	Officer	Director
									<u> </u>
Important: Fill in a	• •			nation mu	ist be in Engl	ish. All an	nounts n	iust be s	stated in
	llars unless oth	nerwise indica	ated.						
1a Name and address of t	foreign corporation					b(1) Emplo	oyer identific	ation numbe	er, if any
						b(2) Befer	ence ID num	iher (see ins	tructions)
									li dollonoj
						c Count	try under wh	ose laws inc	corporated
d Date of incorporation	e Principal plac	e of business	f Principal busine		g Principal b	ousiness activ	ity	h Function	al currency
			code num	ber					
2 Provide the following in	formation for the for	eign corporation's	accounting period st	ated above					
a Name, address, and id					noomo tox roturn u	use filed ante			
United States	lentifying number of	branch office of ag	ent (il any) in the		ncome tax return v			.S. income t	tax paid
				(i) Ta	xable income or (lo	oss)		after all cred	
c Name and address of t of incorporation	foreign corporation's	statutory or reside	ent agent in country		d address (includir with custody of the				
ormoorporation					on of such books a			5 IOFEIGIT CO	rporation, and
Schedule A Stoc	k of the Forei	gn Corporat	ion						
()					(b) Number	of shares issu	ued and outs	standing	
(a)	Description of each	class of stock			Beginning of annu accounting period	al		i) End of an ccounting pe	
For Paperwork Reduct	ion Act Notice, se	ee instructions.		Cat.	No. 49958V		l	Form 547	1 (Rev. 12-2012)

nedule B U.S. Shareholders of	Foreign Corporation (see instructions)		
(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata sha of subpart F income (enter as percentage)
				<u> </u>
nedule C Income Statement (s	see instructions)			

Important: Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for DASTM corporations.

				,	
				Functional Currency	U.S. Dollars
	1a	Gross receipts or sales	1a		
ne	b	Returns and allowances	1b		
	с	Subtract line 1b from line 1a	1c		
	2	Cost of goods sold	2		
	3	Gross profit (subtract line 2 from line 1c)	3		
Income	4	Dividends	4		
Ĭ	5	Interest	5		
	6a	Gross rents	6a		
	b	Gross royalties and license fees	6b		
	7	Net gain or (loss) on sale of capital assets	7		
	8	Other income (attach statement)	8		
	9	Total income (add lines 3 through 8)	9		
	10	Compensation not deducted elsewhere	10		
	11a		11a		
	b	Royalties and license fees	11b		
Deductions	12	Interest	12		
cti	13	Depreciation not deducted elsewhere	13		
qu	14	Depletion	14		
å	15	Taxes (exclude provision for income, war profits, and excess profits taxes)	15		
	16	Other deductions (attach statement-exclude provision for income, war profits,			
		and excess profits taxes)	16		
	17	Total deductions (add lines 10 through 16)	17		
đ	18	Net income or (loss) before extraordinary items, prior period adjustments, and			
Ĕ		the provision for income, war profits, and excess profits taxes (subtract line 17		1	
Net Income		from line 9)	18		
ž lı	19	Extraordinary items and prior period adjustments (see instructions)	19		
ž	20	Provision for income, war profits, and excess profits taxes (see instructions).	20		
	21	Current year net income or (loss) per books (combine lines 18 through 20)	21		
				Form F	471 (Bev 12-2012

nedule B U.S. Shareholders of	Foreign Corporation (see instructions)		
(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. Note: This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata sha of subpart F income (enter as percentage)
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Net Income		from line 9)	18		
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				Form F	471 (Bev 12-2012

Schedule E Income, War Profits, and Excess Profits Taxes Paid or Accrued (see instructions) Amount of tax (a) (b) In foreign currency (c) Conversion rate **(d)** In U.S. dollars Name of country or U.S. possession 1 U.S. 2 3 4 5 6 7 8 Total ► . . .

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

	Assets	(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash		
2 a	Trade notes and accounts receivable		
b	Less allowance for bad debts	()	()
3	Inventories		
4	Other current assets (attach statement)		
5	Loans to shareholders and other related persons 5		
6	Investment in subsidiaries (attach statement) 6		
7	Other investments (attach statement)		
8a	Buildings and other depreciable assets		
b	Less accumulated depreciation	()	()
9a	Depletable assets		
b	Less accumulated depletion	()	()
10	Land (net of any amortization)		
11	Intangible assets:		
а	Goodwill		
b	Organization costs		
С	Patents, trademarks, and other intangible assets		
d	Less accumulated amortization for lines 11a, b, and c	()	()
12	Other assets (attach statement)		
13	Total assets		
	Liabilities and Shareholders' Equity		
14	Accounts payable		
15	Other current liabilities (attach statement)		
16	Loans from shareholders and other related persons		
17	Other liabilities (attach statement)		
18	Capital stock:		
а	Preferred stock		
b	Common stock		
19	Paid-in or capital surplus (attach reconciliation)		
20	Retained earnings 20		
21	Less cost of treasury stock	()	()
22	Total liabilities and shareholders' equity		

Schedule E Income, War Profits, and Excess Profits Taxes Paid or Accrued (see instructions) Amount of tax (a) (b) In foreign currency (c) Conversion rate **(d)** In U.S. dollars Name of country or U.S. possession 1 U.S. 2 3 4 5 6 7 8 Total ► . . .

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1	Cash		
2 a	Trade notes and accounts receivable		
b	Less allowance for bad debts	()	()
3	Inventories		
4	Other current assets (attach statement)		
5	Loans to shareholders and other related persons 5		
6	Investment in subsidiaries (attach statement) 6		
7	Other investments (attach statement)		
8a	Buildings and other depreciable assets		
b	Less accumulated depreciation	()	()
9a	Depletable assets		
b	Less accumulated depletion	()	()
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а	Goodwill		
b	Organization costs		
С	Patents, trademarks, and other intangible assets		
d	Less accumulated amortization for lines 11a, b, and c	()	()
12	Other assets (attach statement)		
13	Total assets		
	Liabilities and Shareholders' Equity		
14	Accounts payable		
15	Other current liabilities (attach statement)		
16	Loans from shareholders and other related persons		
17	Other liabilities (attach statement)		
18	Capital stock:		
а	Preferred stock		
b	Common stock		
19	Paid-in or capital surplus (attach reconciliation)		
20	Retained earnings 20		
21	Less cost of treasury stock	()	()
22	Total liabilities and shareholders' equity		

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Sch	dule G Other Information		
		Yes	No
1	During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign		
	"Yes," see the instructions for required statement.		
2	During the tax year, did the foreign corporation own an interest in any trust?		
3	During the tax year, did the foreign corporation own any foreign entities that were disregarded as entities separate		
	rom their owners under Regulations sections 301.7701-2 and 301.7701-3 (see instructions)?		
	"Yes," you are generally required to attach Form 8858 for each entity (see instructions).		
4	During the tax year, was the foreign corporation a participant in any cost sharing arrangement?		
5	During the course of the tax year, did the foreign corporation become a participant in any cost sharing arrangement?		
6	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations		
	ection 1.6011-4?		
	"Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		
7	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under	_	_
	ection 901(m)?		
8	During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat		
Cak	oreign taxes that were previously suspended under section 909 as no longer suspended?		
	dule H Current Earnings and Profits (see instructions) rtant: Enter the amounts on lines 1 through 5c in functional currency.		
<u>1111111111111111111111111111111111111</u>	Current year net income or (loss) per foreign books of account		
1			
0	Net adjustments made to line 1 to determine current earnings and		
2	profite according to U.S. financial and tax accounting standards		
	(see instructions): Additions		
а	Capital gains or losses		
b	Depreciation and amortization		
c	Depletion .		
c	Investment or incentive allowance		
e	Charges to statutory reserves		
f	Inventory adjustments		
ç	Taxes		
h	Other (attach statement)		
3	Total net additions		
4	Total net subtractions		
5 a	Current earnings and profits (line 1 plus line 3 minus line 4)		
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)		
c	Combine lines 5a and 5b		
с	Current earnings and profits in U.S. dollars (line 5c translated at the appropriate exchange rate as		
	defined in section 989(b) and the related regulations (see instructions))		
	Enter exchange rate used for line 5d ►		
	dule I Summary of Shareholder's Income From Foreign Corporation (see instructions)		
	D on page 1 is completed, a separate Schedule I must be filed for each Category 4 or 5 filer for whom reporting is furr	nishe	d on
this I	orm 5471. This schedule I is being completed for:		

Name	of U.S. shareholder ► I	dentifying number 🕨				
1	Subpart F income (line 38b, Worksheet A in the instructions)		1			
2	Earnings invested in U.S. property (line 17, Worksheet B in the instru-	ctions)	2			
3	Previously excluded subpart F income withdrawn from qualified investments (lin	ne 6b, Worksheet C in the instructions)	3			
4	Previously excluded export trade income withdrawn from investment Worksheet D in the instructions)		4			
5	Factoring income	1	5			
6	Total of lines 1 through 5. Enter here and on your income tax return.	See instructions	6			
7	Dividends received (translated at spot rate on payment date under se	ection 989(b)(1))	7			
8	Exchange gain or (loss) on a distribution of previously taxed income		8			
				Ye	es N	١o
• Was	any income of the foreign corporation blocked?			[] [
• Did a	ny such income become unblocked during the tax year (see section §	964(b))?		[] [
If the a	nswer to either question is "Yes," attach an explanation.					

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Sch	dule G Other Information		
		Yes	No
1	During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign		
	"Yes," see the instructions for required statement.		
2	During the tax year, did the foreign corporation own an interest in any trust?		
3	During the tax year, did the foreign corporation own any foreign entities that were disregarded as entities separate		
	rom their owners under Regulations sections 301.7701-2 and 301.7701-3 (see instructions)?		
	"Yes," you are generally required to attach Form 8858 for each entity (see instructions).		
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5	During the course of the tax year, did the foreign corporation become a participant in any cost sharing arrangement?		
6	During the tax year, did the foreign corporation participate in any reportable transaction as defined in Regulations		
	"Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		
7	During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under	_	_
	ection 901(m)?		
8	During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat		
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<u>1111111111111111111111111111111111111</u>	Current year net income or (loss) per foreign books of account		
1			
0	Net adjustments made to line 1 to determine current earnings and		
2	profits according to U.S. financial and tax accounting standards		
	(see instructions): Additions		
а	Capital gains or losses		
b	Depreciation and amortization		
c	Depletion .		
c	Investment or incentive allowance		
e	Charges to statutory reserves		
f	Inventory adjustments		
ç	Taxes		
h	Other (attach statement)		
3	Total net additions		
4	Total net subtractions		
5 a	Current earnings and profits (line 1 plus line 3 minus line 4)		
b	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions)		
c	Combine lines 5a and 5b		
с	Current earnings and profits in U.S. dollars (line 5c translated at the appropriate exchange rate as		
	defined in section 989(b) and the related regulations (see instructions))		
	Enter exchange rate used for line 5d ►		
	dule I Summary of Shareholder's Income From Foreign Corporation (see instructions)		
	D on page 1 is completed, a separate Schedule I must be filed for each Category 4 or 5 filer for whom reporting is furr	nishe	d on
this I	orm 5471. This schedule I is being completed for:		

Name	of U.S. shareholder ► I	dentifying number 🕨				
1	Subpart F income (line 38b, Worksheet A in the instructions)		1			
2	Earnings invested in U.S. property (line 17, Worksheet B in the instru-	ctions)	2			
3	Previously excluded subpart F income withdrawn from qualified investments (lin	ne 6b, Worksheet C in the instructions)	3			
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5	Factoring income	1	5			
6	Total of lines 1 through 5. Enter here and on your income tax return.	See instructions	6			
7	Dividends received (translated at spot rate on payment date under se	ection 989(b)(1))	7			
8	Exchange gain or (loss) on a distribution of previously taxed income		8			
				Ye	es N	١o
• Was	any income of the foreign corporation blocked?			[] [
• Did a	ny such income become unblocked during the tax year (see section §	964(b))?		[] [
If the a	nswer to either question is "Yes," attach an explanation.					

SCHEDULE J (Form 5471)

(Rev. December 2012)

taxed E&P

line 5a)

line 5b

applicable.)

7

6a Balance of previously taxed E&P at end of year (line 1 plus line 4, minus

b Balance of E&P not previously taxed at end of year (line 3 minus line 4, minus

Balance at end of year. (Enter amount from line 6a or line 6b, whichever is

Department of the Treasury Internal Revenue Service

Accumulated Earnings and Profits (E&P) of Controlled Foreign Corporation

▶ Information about Schedule J (Form 5471) and its instructions is at www.irs.gov/form5471.

OMB No. 1545-0704

Identifying number

► Attach to Form 5471.

	_				
Name	of	person	filing	Form	5471

Name	e of foreign corporation		EIN (if any)		Reference ID number (see instructions)			
	Important: Enter amounts in	(a) Post-1986 Undistributed Earnings	(b) Pre-1987 E&P Not Previously Taxed	(c) Previously Taxed E&P (see instr (sections 959(c)(1) and (2) balar				(d) Total Section 964(a) E&P
functional currency.		(post-86 section 959(c)(3) balance)	(pre-87 section 959(c)(3) balance)		rnings Invested in U.S. Property	<i>(ii)</i> Earnings Invested in Excess Passive Assets	(iii) Subpart F Income	(combine columns (a), (b), and (c))
1	Balance at beginning of year							
2a	Current year E&P							
b	Current year deficit in E&P							
3	Total current and accumulated E&P not previously taxed (line 1 plus line 2a or line 1 minus line 2b)							
4	Amounts included under section 951(a) or reclassified under section 959(c) in current year							
5a	Actual distributions or reclassifications of previously taxed E&P							
b	Actual distributions of nonpreviously							

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Cat. No. 21111K

Schedule J (Form 5471) (Rev. 12-2012)

SCHEDULE J (Form 5471)

(Rev. December 2012)

taxed E&P

line 5a)

line 5b

applicable.)

7

6a Balance of previously taxed E&P at end of year (line 1 plus line 4, minus

b Balance of E&P not previously taxed at end of year (line 3 minus line 4, minus

Balance at end of year. (Enter amount from line 6a or line 6b, whichever is

Department of the Treasury Internal Revenue Service

Accumulated Earnings and Profits (E&P) of Controlled Foreign Corporation

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Name	of	person	filing	Form	5471

Name	e of foreign corporation		EIN (if any)		Reference ID number (see instructions)			
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functional currency.		(post-86 section 959(c)(3) balance)	(pre-87 section 959(c)(3) balance)		rnings Invested in U.S. Property	<i>(ii)</i> Earnings Invested in Excess Passive Assets	(iii) Subpart F Income	(combine columns (a), (b), and (c))
1	Balance at beginning of year							
2a	Current year E&P							
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3	Total current and accumulated E&P not previously taxed (line 1 plus line 2a or line 1 minus line 2b)							
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5a	Actual distributions or reclassifications of previously taxed E&P							
b	Actual distributions of nonpreviously							

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Cat. No. 21111K

Schedule J (Form 5471) (Rev. 12-2012)

SCHEDULE M (Form 5471)

(Rev. December 2012)

Department of the Treasury

Internal Revenue Service Name of person filing Form 5471

Transactions Between Controlled Foreign Corporation and Shareholders or Other Related Persons Information about Schedule M (Form 5471) and its instructions is at www.irs.gov/form5471.

OMB No. 1545-0704

Attach to Form 5471.

Identifying number

Reference ID number (see instructions) Name of foreign corporation EIN (if any) **Important:** Complete a **separate** Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions. Enter the relevant functional currency and the exchange rate used throughout this schedule (e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return) (d) Any other foreign corporation or partnership controlled by U.S. person filing this return (f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation (c) Any domestic (a) Transactions corporation or partnership controlled by U.S. person filing this return (b) U.S. person of filing this return foreign corporation **1** Sales of stock in trade (inventory) . . 2 Sales of tangible property other than stock in trade 3 Sales of property rights (patents, trademarks, etc.) Platform contribution transaction payments 4 received 5 Cost sharing transaction payments received 6 Compensation received for technical, managerial, engineering, construction, or like services 7 Commissions received 8 Rents, royalties, and license fees received Dividends received (exclude deemed q distributions under subpart F and distributions of previously taxed income) **10** Interest received **11** Premiums received for insurance reinsurance Add lines 1 through 11 12 13 Purchases of stock in trade (inventory) . Purchases of tangible property other than 14 stock in trade. 15 Purchases of property rights (patents, trademarks, etc.) 16 Platform contribution transaction payments paid 17 Cost sharing transaction payments paid . 18 Compensation paid for technical. managerial, engineering, construction, or like services **19** Commissions paid Rents, royalties, and license fees paid 20 . **21** Dividends paid **22** Interest paid 23 Premiums paid for insurance or reinsurance **24** Add lines 13 through 23. 25 Amounts borrowed (enter the maximum loan balance during the year) - see instructions 26 Amounts loaned (enter the maximum loan

balance during the year) - see instructions

SCHEDULE M (Form 5471)

(Rev. December 2012)

Department of the Treasury

Internal Revenue Service Name of person filing Form 5471

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