# FORM 1120-F TEST SCENARIO 7

**FORMS REQUIRED:** 1042-S,1120-F, Sch H, Sch I, Sch M1 and M2, Sch M-3, Sch P, Sch S, Sch V, 1120 Sch UTP, 1125-E, 4626, 5472, 8453-I

**ATTACHMENTS:**
AccountingMethodChangeFromPriorYearStatement
DeterminationMethodChangeFromPriorYearStatement
ItemizedOtherIncomeSchedule
ConnectedEarningsProfitsSchedule
USNetEquityEndOfCurrentYearSchedule
USNetEquityEndOfPriorYearSchedule
ItemizedOtherInvestmentsSchedule
OtherNonCurrentUSAssetsSchedule
MortgagesEtcPayableGreaterThan1YrThirdPartyLiabilitiesSchedule
Section1445and1446TaxStatement
HomeOfficeDeductibleExpenseComputationStatement
AdjustmentsForUSTaxPrinciplesInUSDollarsSchedule
PubliclyTradedStockSchedule
IdentifySetsOfBooksAndIncomeLossSchedule
OtherIncomeLossItemsWithDifferencesSchedule
VesselOrAircraftCharterInStatement
VesselOrAircraftCharterOutStatement

**BINARY ATTACHMENTS:** Scanned Form 8453-I (8453 Signature Document)

**HEADER INFO** not on actual forms:

**MultipleSoftwarePackagesUsed:** No

**Originator:**
**EFIN:** Use your EFIN
**Type:** ERO
**Practioner PIN:** N/A (using scanned Form 8453-I)
**PIN Entered by:** N/A

**Signature Option:** Binary Attachment 8453 Signature Document

**Officer:**
**Name:** Samuel L Booker
**Title:** Chief Financial Officer
**Taxpayer PIN:** N/A (using scanned Form 8453-I)
**Phone:** 000-321-7654
**Email Address:** sam.brintz@rmni.com
**Date Signed**: 08/28/2016

**Preparer:**
**Name:** John E. Suiter
**Email Address:** john.e.suiter@AAATax.com
**Date Prepared:** 08/20/2016

**Name Control:** **RMNI**

**Attachment 1, Form 1120F, Item "H":** Accounting method changes *(AccountingMethodChangeFromPriorYearStatement)*

We changed our method of accounting from cash to accrual.

**Attachment 2, Form 1120F, Item "I":** Determination method changes *(DeterminationMethodChangeFromPriorYearStatement)*

We changed our method of accounting from cash to accrual.

**Attachment 3, Form 1120F Section II, line 10:** Itemized other Income Schedule *(ItemizedOtherIncomeSchedule)*

Corp Name: RMN Incorporated
EIN: 00-0000600
Income Type: Exchange Gain/Loss Realized
Amount: -300,000

**Attachment 4, Form 1120F, Section III, Part 1, line 2**: Connected Earnings and Profits (*ConnectedEarningsProfitsSchedule)*

Corp Name: RMN Incorporated
EIN: 00-0000600
Adjustment to Corporations effectively connected taxable income: Depreciation Temporary Difference
Positive Adjustment: 4,114,900

**Attachment 5, Form 1120F, Section III, Part 1, Line 4a:** U.S. Net Equity at End of Current Year (*USNetEquityEndOfCurrentYearSchedule*)

Net Equity at the end of the year:
Property A: 260,000,000

**Attachment 6, Form 1120-F, Section III, Part I, Line 4b:** U.S. Net Equity at End of Prior Year (*USNetEquityEndOfPriorYearSchedule)*

Net Equity at the end of the prior year:
Property A: 250,000,000

**Attachment 7, Form 1120-F, Schedule L, Line 9 (b):** Other Investments US *(ItemizedOtherInvestmentsSchedule)*

Corp Name: RMN Incorporated
EIN: 00-0000600
Description: Loans to customers
Beginning Amount: 100,000,000
Ending Amount: 100,000,000

**Attachment 8, Form 1120-F, Schedule L, Line 16b**: Other Non Current Assets US *(OtherNonCurrentUSAssetsSchedule)*

Corp Name: RMN Incorporated
EIN: 00-0000600
Description: Related Party
Beginning Amount: 10,000,000
Ending Amount: 10,000,000

**Attachment 9, Form 1120-F, Schedule L, Line 22b:** Third Party Liabilities (*MortgagesEtcPayableGreaterThan1YrThirdPartyLiabilitiesSchedule)*

Corp Name: RMN Incorporated
EIN: 00-0000600
Description: Long term borrowing
Beginning Amount: 250,000,000
Ending Amount: 240,000,000

**Attachment 10, Form 1120F, Schedule W line 3:** Section 1445 and 1446 Tax Statement *(Section1445and1446TaxStatement)*

Tax on ECI: 4,316,900
Refigured Taxable Income: 12,334,000
Refigured Tax on ECI: 4,316,900
Calculated Tax, Sections 1445 and 1446: 0

**Attachment 11, Form 1120-F, Schedule H, Part II, line 16:** Remaining home office expense (*HomeOfficeDeductibleExpenseComputationStatement)*

Home Office Expense: 150,000

**Attachment 12, Form 1120-F, Schedule H, Part IV, line 30:** Adjustments For US Tax Principles in US Dollars Schedule *(AdjustmentsForUSTaxPrinciplesInUSDollarsSchedule)*

Item Description: Adjustment
Amount: -4,296,000

**Attachment 13, Form 1120-F, Schedule M-3, Part I, line 3:** Publicly Traded Stock Schedule (*PubliclyTradedStockSchedule)*

Stock Exchange: London Exchange
Trading Symbol: RMNI

**Attachment 14, Form 1120-F, Schedule M-3, Part 1, line 4:** Identify Sets of Books and Income Loss Schedule (*IdentifySetsOfBooksAndIncomeLossSchedule)*

Book used: Non-Consolidated Worldwide Books
Net Income/Loss: 12,230,000

**Attachment 15, Form 1120-F, Schedule M-3, Part II, line 24:** Other Income (Loss) Items with Differences Schedule (*OtherIncomeLossItemsWithDifferencesSchedule)*

| | Per Income Statement | Temporary Differences | Permanent Differences | Oth Perm Differences | Per Tax Return |
|---|---|---|---|---|---|
| Exchange Gain/ Loss Realized | (333,500) | 0 | 33,500 | 0 | (300,000) |

**Attachment 16, Form 1120-F, Schedule V, line 3:** Vessel Or Aircraft Chartered in Statement (*VesselOrAircraftCharterInStmt)*

| | |
|---|---|
| Name of Vessel: | Jill |
| Name of Lessor: | Jill Bnimble |
| Address of Lessor: | 55 Any Street, Beanstock, TX 77287 |
| Term of lease: | 60 months |
| Method for calculating: | Accounting method used |

| | |
|---|---|
| Name of Vessel: | Jack |
| Name of Lessor: | Jack Bnimble |
| Address of Lessor: | 33 Any Street, Beanstock, TX 77287 |
| Term of lease: | 90 months |
| Method for calculating: | Accounting method used |

**Attachment 17, Form 1120-F, Schedule V, line 4:** Vessel Or Aircraft Chartered Out Statement (*VesselOrAircraftCharterOutStmt)*

| | |
|---|---|
| Name of Vessel: | Jill |
| Country of Registration: | United States |
| Name of each Lessee: | Jack Bnimble |
| Address of each Lessee: | 33 Any Street, Beanstock, TX 77287 |
| Term of each lease: | 60 months |
| Days under use: | 120 |
| Method Used: | Actual Method |
| Calculation Used: | Accounting method used |

| | |
|---|---|
| Name of Vessel: | Jack |
| Country of Registration: | United States |
| Name of each Lessee: | Jill Bnimble |
| Address of each Lessee: | 55 Any Street, Beanstock, TX 77287 |
| Term of each lease: | 60 months |
| Days under use: | 150 |
| Method Used: | Actual Method |
| Calculation Used: | Accounting method used |

Form **1120-F**

Department of the Treasury
Internal Revenue Service

# U.S. Income Tax Return of a Foreign Corporation

For calendar year 2016, or tax year beginning _____, 2016, and ending _____, 20 _____

▶ **Information about Form 1120-F and its separate instructions is at *www.irs.gov/form1120f*.**

OMB No. 1545-0123

**2016**

| Type or Print | Name: RMN Incorporated | Employer identification number: 00-0000600 |
|---|---|---|
| | Number, street, and room or suite no. (see instructions): 1234 Main Street | Check box(es) if: ☐ Initial return ☐ Name or address change ☐ Final return ☐ First post-merger return ☐ Amended return ☑ Schedule M-3 attached ☐ Protective return |
| | City or town, state or province, country, and ZIP or foreign postal code: Sydney, Victoria Australia 3000 | |

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**A** Country of incorporation Australia

**B** Foreign country under whose laws the income reported on this return is also subject to tax Australia

**C** Date incorporated 9/15/2000

**D** **(1)** Location of corporation's primary books and records (city, province or state, and country) Sydney, Victoria, Australia

**(2)** Principal location of worldwide business 1234 Main Australia

**(3)** If the corporation maintains an office or place of business in the United States, check here ▶ ☑

**E** If the corporation had an agent in the United States at any time during the tax year, enter:
**(1)** Type of agent
**(2)** Name
**(3)** Address

**F** See the instructions and enter the corporation's principal:
**(1)** Business activity code number ▶ 485320
**(2)** Business activity ▶ Limousine Service
**(3)** Product or service ▶ Chauffeur Service

**G** Check method of accounting: **(1)** ☐ Cash **(2)** ☑ Accrual
**(3)** ☐ Other (specify) ▶

## Computation of Tax Due or Overpayment

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 1 | Tax from Section I, line 11, page 3 | | | 1 | 25,000 | | |
| 2 | Tax from Section II, Schedule J, line 9, page 5 | | | 2 | 4,316,900 | | |
| 3 | Tax from Section III (add lines 6 and 10 on page 6) | | | 3 | 1,936,470 | | |
| 4 | **Total tax.** Add lines 1 through 3 | | | | | 4 | 6,278,370 |
| 5a | 2015 overpayment credited to 2016 | 5a | 100,000 | | | | |
| b | 2016 estimated tax payments | 5b | 6,200,000 | | | | |
| c | Less 2016 refund applied for on Form 4466 | 5c | ( ) | | | | |
| d | Combine lines 5a through 5c | | | 5d | 6,300,000 | | |
| e | Tax deposited with Form 7004 | | | 5e | 100,000 | | |
| f | Credit for tax paid on undistributed capital gains (attach Form 2439) | | | 5f | | | |
| g | Credit for federal tax paid on fuels (attach Form 4136). See instructions | | | 5g | | | |
| h | Refundable credit from Form 8827, line 8c | | | 5h | | | |
| i | U.S. income tax paid or withheld at source (add line 12, page 2, and amounts from Forms 8288-A and 8805 (attach Forms 8288-A and 8805)) | | | 5i | 30,000 | | |
| j | Total payments. Add lines 5d through 5i | | | | | 5j | 6,430,000 |
| 6 | Estimated tax penalty (see instructions). Check if Form 2220 is attached ▶ ☐ | | | | | 6 | |
| 7 | **Amount owed.** If line 5j is smaller than the total of lines 4 and 6, enter amount owed | | | | | 7 | |
| 8a | **Overpayment.** If line 5j is larger than the total of lines 4 and 6, enter amount overpaid | | | | | 8a | 151,630 |
| b | **Amount of overpayment on line 8a resulting from tax deducted and withheld under Chapters 3 and 4** (from Schedule W, line 7, page 8) | | | | | 8b | 5,000 |
| 9 | Enter portion of line 8a you want **Credited to 2017 estimated tax** ▶ | | | **Refunded** ▶ | | 9 | 151,630 |

**Sign Here**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

▶ Signature of officer _____ Date _____ ▶ Chief Financial Officer Title

May the IRS discuss this return with the preparer shown below (see instructions)? ☑ **Yes** ☐ **No**

**Paid Preparer Use Only**

| Print/Type preparer's name | Preparer's signature | Date | Check ☐ if self-employed | PTIN |
|---|---|---|---|---|
| | | | | P00000007 |
| Firm's name ▶ AAA Tax Service | | | Firm's EIN ▶ 00-0000300 | |
| Firm's address ▶ 4000 3rd Street, Suite 100, Portland, OR 97201 | | | Phone no. | |

**For Paperwork Reduction Act Notice, see separate instructions.**

Cat. No. 11470I Form **1120-F** (2016)

## Additional Information *(continued from page 1)*

| | | Yes | No |
|---|---|---|---|
| H | Did the corporation's method of accounting change from the preceding tax year? | ✓ | |
| | If "Yes," attach a statement with an explanation. | | |
| I | Did the corporation's method of determining income change from the preceding tax year? | ✓ | |
| | If "Yes," attach a statement with an explanation. | | |
| J | Did the corporation file a U.S. income tax return for the preceding tax year? | ✓ | |
| K | **(1)** At any time during the tax year, was the corporation engaged in a trade or business in the United States? | ✓ | |
| | **(2)** If "Yes," is taxpayer's trade or business within the United States solely the result of a section 897 (FIRPTA) sale or disposition? | | ✓ |
| L | Did the corporation have a permanent establishment in the United States for purposes of any applicable tax treaty between the United States and a foreign country? | ✓ | |
| | If "Yes," enter the name of the foreign country: Australia | | |
| M | Did the corporation have any transactions with related parties? | ✓ | |
| | If "Yes," Form 5472 may have to be filed (see instructions). Enter number of Forms 5472 attached ► 1 | | |
| N | Is the corporation a controlled foreign corporation? (See section 957(a) for definition.) | ✓ | |
| O | Is the corporation a personal service corporation? (See instructions for definition.) | ✓ | |
| P | Enter tax-exempt interest received or accrued during the tax year (see instructions) ► $ | | |
| Q | At the end of the tax year, did the corporation own, directly or indirectly, 50% or more of the voting stock of a U.S. corporation? (See section 267(c) for rules of attribution.) | | ✓ |
| | If "Yes," attach a statement showing **(1)** name and EIN of such U.S. corporation; **(2)** percentage owned; and **(3)** taxable income or (loss) before NOL and special deductions of such U.S. corporation for the tax year ending with or within your tax year. | | |
| R | If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here ► ☐ | | |
| S | Enter the available NOL carryover from prior tax years. (Do not reduce it by any deduction on line 30a, page 4.) ► $ | | |

| | | Yes | No |
|---|---|---|---|
| T | Is the corporation a subsidiary in a parent-subsidiary controlled group? | ✓ | |
| | If "Yes," enter the parent corporation's: **(1)** EIN ► 00-0000042 **(2)** Name ► Second Limousine Services | | |
| U | **(1)** Is the corporation a dealer under section 475? | | ✓ |
| | **(2)** Did the corporation mark to market any securities or commodities other than in a dealer capacity? | | ✓ |
| V | At the end of the tax year, did any individual, partnership, corporation, estate, or trust own, directly or indirectly, 50% or more of the corporation's voting stock? (See section 267(c) for rules of attribution.) | | ✓ |
| | If "Yes," attach a statement showing the name and identifying number. (Do not include any information already entered in item **T.**) Enter percentage owned ► | | |
| W | **(1)** Is the corporation taking a position on this return that a U.S. tax treaty overrules or modifies an Internal Revenue law of the United States, thereby causing a reduction of tax? | | ✓ |
| | If "Yes," the corporation is generally required to complete and attach Form 8833. See Form 8833 for exceptions. **Note:** *Failure to disclose a treaty-based return position may result in a $10,000 penalty (see section 6712).* | | |
| | **(2)** Is the corporation claiming treaty benefits pursuant to a Competent Authority determination? | | ✓ |
| | If "Yes," attach a copy of the Competent Authority determination letter to your return. | | |
| X | During the tax year, did the corporation own any entity that was disregarded as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3? | | ✓ |
| | If "Yes," attach a statement listing the name, country under whose laws the entity was organized, and EIN (if any) of each such entity. | | |
| Y | **(1)** Did a partnership allocate to the corporation a distributive share of income from a directly owned partnership interest, any of which is ECI or treated as ECI by the partnership or the partner? | ✓ | |
| | If "Yes," attach Schedule P. See instructions. | | |
| | **(2)** During the tax year, did the corporation own directly or indirectly, at least a 10% interest, in any foreign partnership? | | ✓ |
| | If "Yes," see instructions for required attachment. | | |
| Z | **(1)** Has the corporation engaged in any transactions the results of which are subject to the arm's length standard under section 482 and its regulations? | ✓ | |
| | **(2)** Has the corporation recognized any interbranch amounts? If "Yes," attach statement (see instructions) | | ✓ |
| AA | Is the corporation required to file Schedule UTP (Form 1120), Uncertain Tax Position Statement (see instructions)? If "Yes," complete and attach Schedule UTP. | ✓ | |
| BB | During the corporation's tax year, did the corporation make any payments that would require it to file Forms 1042 and 1042-S under chapter 3 (sections 1441 through 1464) or chapter 4 (sections 1471 through 1474) of the Code? | ✓ | |

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**SECTION I — Income From U.S. Sources Not Effectively Connected With the Conduct of a Trade or Business in the United States —** Do not report items properly withheld and reported on Form 1042-S. See instructions.

Report all gross transportation income subject to 4% tax on line 9. Report other column (a) income items only if not properly withheld and reported on Form 1042-S. The rate of tax on these **gross** income items is 30% or such lower rate specified by tax treaty. No deductions are allowed against these types of income. Enter treaty rates where applicable. **If the corporation is claiming a lower treaty rate, also complete item W above.** If multiple treaty rates apply to a type of income (e.g., subsidiary and portfolio dividends or dividends received by disregarded entities), attach a statement showing the amounts, tax rates, and withholding for each.

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Name of treaty country, if any ▶

| | (a) Class of income (see instructions) | (b) Gross amount | (c) Rate of tax (%) | (d) Amount of tax liability | (e) Amount of U.S. income tax paid or withheld at the source |
|---|---|---|---|---|---|
| 1 | Interest | 20,000 | 10 | 2,000 | 4,000 |
| 2 | Dividends | 6,665 | 15 | 1,000 | 2,000 |
| 3 | Rents | 50,000 | 20 | 10,000 | 20,000 |
| 4 | Royalties | 40,000 | 5 | 2,000 | 4,000 |
| 5 | Annuities | | | | |
| 6 | Gains from disposal of timber, coal, or domestic iron ore with a retained economic interest (attach supporting statement) | | | | |
| 7 | Gains from sale or exchange of patents, copyrights, etc. | | | | |
| 8 | Fiduciary distributions (attach supporting statement) | | | | |
| 9 | Gross transportation income (see instructions) | 250,000 | 4 | 10,000 | |
| 10 | Other items of income | | | | |
| 11 | Total. Enter here and on line 1, page 1 ▶ | | | 25,000 | |
| 12 | Total. Enter here and include on line 5i, page 1 ▶ | | | | 30,000 |

13 Is the corporation fiscally transparent under the laws of the foreign jurisdiction with respect to any item of income listed above? ☐ Yes ☑ No

If "Yes," attach a statement that provides the information requested above with respect to each such item of income.

## SECTION II—Income Effectively Connected With the Conduct of a Trade or Business in the United States (see instructions)

**Important:** *Fill in all applicable lines and schedules. If you need more space, see* ***Assembling the Return*** *in the instructions.*

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| | | | | | | |
|---|---|---|---|---|---|---|
| Income | 1a | Gross receipts or sales 25,534,000 | b Less returns and allowances 7,500 | c Bal ▶ 1c | 25,526,500 | |
| | 2 | Cost of goods sold (attach Form 1125-A) | | 2 | | |
| | 3 | Gross profit (subtract line 2 from line 1c) | | 3 | 25,526,500 | |
| | 4 | Dividends (Schedule C, line 14) | | 4 | 13,500 | |
| | 5 | Interest | | 5 | | |
| | 6 | Gross rents | | 6 | | |
| | 7 | Gross royalties | | 7 | | |
| | 8 | Capital gain net income (attach Schedule D (Form 1120)) | | 8 | | |
| | 9 | Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797) | | 9 | | |
| | 10 | Other income (see instructions—attach statement) | | 10 | (300,000) | |
| | 11 | **Total income.** Add lines 3 through 10 ▶ | | 11 | 25,240,000 | |
| Deductions (See instructions for limitations on deductions.) | 12 | Compensation of officers (see instructions—attach Form 1125-E) | | 12 | 250,000 | |
| | 13 | Salaries and wages (less employment credits) | | 13 | | |
| | 14 | Repairs and maintenance | | 14 | | |
| | 15 | Bad debts (for bad debts over $500,000, attach a list of debtors and amounts) | | 15 | | |
| | 16 | Rents | | 16 | | |
| | 17 | Taxes and licenses | | 17 | | |
| | 18 | Interest expense from Schedule I, line 25 (see instructions) | | 18 | 12,500,000 | |
| | 19 | Charitable contributions | | 19 | | |
| | 20 | Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562) | | 20 | | |
| | 21 | Depletion | | 21 | | |
| | 22 | Advertising | | 22 | | |
| | 23 | Pension, profit-sharing, etc., plans | | 23 | | |
| | 24 | Employee benefit programs | | 24 | | |
| | 25 | Domestic production activities deduction (attach Form 8903) | | 25 | | |
| | 26 | Deductions allocated and apportioned to ECI from Schedule H, line 20 (see instructions) | | 26 | 150,000 | |
| | 27 | Other deductions (attach statement) | | 27 | | |
| | 28 | **Total deductions.** Add lines 12 through 27 ▶ | | 28 | 12,900,000 | |
| | 29 | Taxable income before NOL deduction and special deductions (subtract line 28 from line 11) ▶ | | 29 | 12,340,000 | |
| | 30 | **Less:** a Net operating loss deduction (see instructions) | 30a | | | |
| | | b Special deductions (Schedule C, line 15) | 30b 6,000 | | | |
| | | c Add lines 30a and 30b | | 30c | 6,000 | |
| | 31 | Taxable income or (loss). Subtract line 30c from line 29 | | 31 | 12,334,000 | |

## SECTION II—Income Effectively Connected With the Conduct of a Trade or Business in the United States *(Continued)*

### Schedule C Dividends and Special Deductions (see instructions)

| | | (a) Dividends received | (b) % | (c) Special deductions: (a) × (b) |
|---|---|---|---|---|
| 1 | Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock) | | 70 | |
| 2 | Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock) | 7,500 | 80 | 6,000 |
| 3 | Dividends on debt-financed stock of domestic and foreign corporations (section 246A) | | see instructions | |
| 4 | Dividends on certain preferred stock of less-than-20%-owned public utilities | | 42 | |
| 5 | Dividends on certain preferred stock of 20%-or-more-owned public utilities | | 48 | |
| 6 | Dividends from less-than-20%-owned foreign corporations | | 70 | |
| 7 | Dividends from 20%-or-more-owned foreign corporations | | 80 | |
| 8 | **Total.** Add lines 1 through 7. See instructions for limitation | | | 6,000 |
| 9 | Dividends from foreign corporations not included on lines 3, 6, or 7 | | | |
| 10 | Foreign dividend gross-up (section 78) | | | |
| 11 | IC-DISC and former DISC dividends not included on lines 1, 2, or 3 (section 246(d)) | 6,000 | | |
| 12 | Other dividends | | | |
| 13 | Deduction for dividends paid on certain preferred stock of public utilities | | | |
| 14 | **Total dividends.** Add lines 1 through 12. Enter here and on line 4, page 4 | 13,500 | | |
| 15 | **Total special deductions.** Add lines 8 and 13. Enter here and on line 30b, page 4 ▶ | | | 6,000 |

### Schedule J Tax Computation (see instructions)

| | | | | | |
|---|---|---|---|---|---|
| 1 | Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)) ▶ ☐ | | | | |
| 2 | Income tax. Check if a qualified personal service corporation (see instructions) ▶ ☑ | | | 2 | 4,316,900 |
| 3 | Alternative minimum tax (attach Form 4626) | | | 3 | 0 |
| 4 | Add lines 2 and 3 | | | 4 | 4,316,900 |
| 5a | Foreign tax credit (attach Form 1118) | 5a | | | |
| b | General business credit (attach Form 3800) | 5b | | | |
| c | Credit for prior year minimum tax (attach Form 8827) | 5c | | | |
| d | Bond credits from Form 8912 | 5d | | | |
| 6 | **Total credits.** Add lines 5a through 5d | | | 6 | |
| 7 | Subtract line 6 from line 4 | | | 7 | 4,316,900 |
| 8 | Other taxes. Check if from: ☐ Form 4255 ☐ Form 8611 ☐ Form 8697 ☐ Form 8866 ☐ Form 8902 ☐ Other (attach statement) | | | 8 | |
| 9 | **Total tax.** Add lines 7 and 8. Enter here and on line 2, page 1 | | | 9 | 4,316,900 |



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## SECTION III—Branch Profits Tax and Tax on Excess Interest

### Part I—Branch Profits Tax (see instructions)

| | | | | |
|---|---|---|---|---|
| 1 | Enter the amount from Section II, line 29 | 1 | 12,340,000 | |
| 2 | Enter total adjustments to line 1 to get effectively connected earnings and profits. (Attach required statement showing the nature and amount of adjustments.) (See instructions.) | 2 | 4,114,900 | |
| 3 | Effectively connected earnings and profits. Combine line 1 and line 2 | 3 | 16,454,900 | |
| 4a | Enter U.S. net equity at the end of the current tax year. (Attach required statement.) | 4a | 260,000,000 | |
| b | Enter U.S. net equity at the end of the prior tax year. (Attach required statement.) | 4b | 250,000,000 | |
| c | Increase in U.S. net equity. If line 4a is greater than or equal to line 4b, subtract line 4b from line 4a. Enter the result here and skip to line 4e | 4c | 10,000,000 | |
| d | Decrease in U.S. net equity. If line 4b is greater than line 4a, subtract line 4a from line 4b | 4d | | |
| e | Non-previously taxed accumulated effectively connected earnings and profits. Enter excess, if any, of effectively connected earnings and profits for preceding tax years beginning after 1986 over any dividend equivalent amounts for those tax years | 4e | | |
| 5 | Dividend equivalent amount. Subtract line 4c from line 3. If zero or less, enter -0-. If no amount is entered on line 4c, add the lesser of line 4d or line 4e to line 3 and enter the total here | 5 | 6,454,900 | |
| 6 | **Branch profits tax.** Multiply line 5 by 30% (0.30) (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See instructions.) Enter here and include on line 3, page 1. **Also complete item W on page 2** | 6 | 1,936,470 | |

### Part II—Tax on Excess Interest (see instructions for this Part and for Schedule I (Form 1120-F))

| | | | | |
|---|---|---|---|---|
| 7a | Enter the interest from Section II, line 18 | 7a | 12,500,000 | |
| b | Enter the inverse of the total amount deferred, capitalized, and disallowed from Schedule I, line 24d (i.e., if line 24d is negative, enter as a positive number; if line 24d is positive, enter as a negative number) | 7b | | |
| c | Combine lines 7a and 7b (amount must equal Schedule I, line 23) | 7c | 12,500,000 | |
| 8 | **Branch Interest** (see instructions for definition): Enter the sum of Schedule I, line 9, column (c), and Schedule I, line 22. If the interest paid by the foreign corporation's U.S. trade or business was increased because 80% or more of the foreign corporation's assets are U.S. assets, check this box ▶ ☐ | 8 | 12,500,000 | |
| 9a | Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0- | 9a | 0 | |
| b | If the foreign corporation is a bank, enter the excess interest treated as interest on deposits (see instructions for rules for computing this amount). Otherwise, enter -0-. | 9b | | |
| c | Subtract line 9b from line 9a | 9c | | |
| 10 | **Tax on excess interest.** Multiply line 9c by 30% (0.30) (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See instructions.) Enter here and include on line 3, page 1. **Also complete item W on page 2** | 10 | | |

### Part III—Additional Information

| | | Yes | No |
|---|---|---|---|
| 11 | Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to: | | |
| a | A complete termination of all U.S. trades or businesses? | | ✓ |
| b | The tax-free liquidation or reorganization of a foreign corporation? | | ✓ |
| c | The tax-free incorporation of a U.S. trade or business? | | ✓ |

If **11a** or **11b** applies and the transferee is a domestic corporation, attach Form 8848. If **11c** applies, attach the statement required by Temporary Regulations section 1.884-2T(d)(5).

DRAFT AS OF June 22, 2016 DO NOT FILE

**Note:** *Check if completing on* ▶ ☐ U.S. basis or ☑ Worldwide basis.

## Schedule L Balance Sheets per Books

| | | Beginning of tax year | | End of tax year | |
|---|---|---|---|---|---|
| | **Assets** | (a) | (b) | (c) | (d) |
| 1 | Cash | | 10,000,000 | | 10,000,000 |
| 2a | Trade notes and accounts receivable | | | | |
| b | Less allowance for bad debts | ( ) | | ( ) | |
| 3 | Inventories | | | | |
| 4 | U.S. government obligations | | | | |
| 5 | Tax-exempt securities (see instructions) | | | | |
| 6a | Interbranch current assets* | | | | |
| b | Other current non-U.S. assets* | | | | |
| c | Other current U.S. assets* | | | | |
| 7 | Loans to shareholders | | | | |
| 8 | Mortgage and real estate loans | | | | |
| 9a | Other loans and investments—non-U.S. assets* | | | | |
| b | Other loans and investments—U.S. assets* | | 100,000,000 | | 100,000,000 |
| 10a | Buildings and other depreciable assets | | | | |
| b | Less accumulated depreciation | ( ) | | ( ) | |
| 11a | Depletable assets | | | | |
| b | Less accumulated depletion | ( ) | | ( ) | |
| 12 | Land (net of any amortization) | | | | |
| 13a | Intangible assets (amortizable only) | | | | |
| b | Less accumulated amortization | ( ) | | ( ) | |
| 14 | Assets held in trust | | 380,000,000 | | 380,000,000 |
| 15 | Other non-current interbranch assets* | | | | |
| 16a | Other non-current non-U.S. assets* | | | | |
| b | Other non-current U.S. assets* | | 10,000,000 | | 10,000,000 |
| 17 | Total assets | | 500,000,000 | | 500,000,000 |
| | **Liabilities** | | | | |
| 18 | Accounts payable | | | | |
| 19 | Mortgages, notes, bonds payable in less than 1 year: | | | | |
| a | Interbranch liabilities* | | | | |
| b | Third-party liabilities* | | | | |
| 20 | Other current liabilities* | | | | |
| 21 | Loans from shareholders | | | | |
| 22 | Mortgages, notes, bonds payable in 1 year or more: | | | | |
| a | Interbranch liabilities* | | | | |
| b | Third-party liabilities* | | 250,000,000 | | 240,000,000 |
| 23 | Liabilities held in trust | | | | |
| 24a | Other interbranch liabilities* | | | | |
| b | Other third-party liabilities* | | | | |
| | **Equity** | | | | |
| 25 | Capital stock: a Preferred stock | | | | |
| | b Common stock | 50,000,000 | 50,000,000 | 50,000,000 | 50,000,000 |
| 26 | Additional paid-in capital | | 200,000,000 | | 201,796,900 |
| 27 | Retained earnings—Appropriated* | | | | |
| 28 | Retained earnings—Unappropriated | | | | 8,203,100 |
| 29 | Adjustments to shareholders' equity* | | | | |
| 30 | Less cost of treasury stock | | ( ) | | ( ) |
| 31 | Total liabilities and shareholders' equity | | 500,000,000 | | 500,000,000 |

*Attach statement—see instructions.

DRAFT AS OF June 2, 2016 DO NOT FILE

## Schedule W Overpayment Resulting From Tax Deducted and Withheld Under Chapters 3 and 4

| | | | | | |
|---|---|---|---|---|---|
| 1 | **Total Chapter 3 and 4 payments.** Enter the amount from page 1, line 5i | | | 1 | 30,000 |
| 2 | Enter the tax amount from page 1, line 1 | 2 | 25,000 | | |
| 3 | Enter the portion of the tax amount shown on page 1, line 2 pertaining to income associated with amounts deducted and withheld under sections 1445 and 1446 (see instructions for general guidelines) | 3 | 0 | | |
| 4 | **Total Chapter 3 and 4 tax.** Combine lines 2 and 3 | | | 4 | 25,000 |
| 5 | **Tentative overpayment resulting from tax deducted and withheld under Chapters 3 and 4.** Subtract line 4 from line 1 | | | 5 | 5,000 |
| 6 | Enter the amount from page 1, line 8a | | | 6 | 151,630 |
| 7 | **Overpayment resulting from tax deducted and withheld under Chapters 3 and 4.** Enter the smaller of line 5 or line 6. Enter the result here and on page 1, line 8b | | | 7 | 5,000 |

Form **1120-F** (2016)

DRAFT AS OF
June 22, 2016
DO NOT FILE

**SCHEDULE H (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# Deductions Allocated To Effectively Connected Income Under Regulations Section 1.861-8

▶ Attach to Form 1120-F.
▶ Information about Schedule H (Form 1120-F) and its separate instructions is at *www.irs.gov/form1120f.*

OMB No. 1545-0123

2016

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

DRAFT AS OF May 31, 2016 DO NOT FILE

## Part I Home Office Deductible Expenses Definitely Related Solely to ECI or Non-ECI

**Note:** Enter all amounts on lines 1a through 13 in only U.S. dollars or in only functional currency. If U.S. dollars, check box ☑. Otherwise, specify currency ▶

| | | | | | |
|---|---|---|---|---|---|
| 1a | Total expenses on the books of the home office | 1a | 26,000,000 | | |
| b | Check the applicable box below to indicate the accounting convention used to compute the amount on line 1a: ☑ U.S. GAAP ☐ Home Country GAAP ☐ IFRS ☐ Other (specify) ▶ | | | | |
| 2 | Adjustments for U.S. tax principles (attach statement – see instructions) | 2 | | | |
| 3 | Total deductible expenses on the books of the home office. Combine lines 1a and 2 | | | 3 | 26,000,000 |
| 4 | Interest expense included on line 3 | 4 | 25,000,000 | | |
| 5 | Bad debt expense included on line 3 | 5 | | | |
| 6 | Total of interest expense and bad debt expense. Add lines 4 and 5 | | | 6 | 25,500,000 |
| 7 | Remaining deductible expenses to be allocated and apportioned between ECI and non-ECI. Subtract line 6 from line 3 | | | 7 | 500,000 |
| 8 | Deductible expenses definitely related solely to non-ECI from subsidiaries | 8 | | | |
| 9 | Deductible expenses definitely related solely to other non-ECI booked in the home country | 9 | 200,000 | | |
| 10 | Deductible expenses definitely related solely to other non-ECI booked in other countries (including the United States) | 10 | | | |
| 11 | Deductible expenses definitely related solely to ECI | 11 | | | |
| 12 | Total deductible expenses definitely related solely to ECI or non-ECI. Add lines 8 through 11 | | | 12 | 200,000 |

## Part II Home Office Deductible Expenses Allocated and Apportioned to ECI

**Note:** Enter the amounts on lines 15 through 20 in U.S. dollars.

| | | | |
|---|---|---|---|
| 13 | Remaining deductible expenses on the books of the home office not definitely related solely to ECI or non-ECI. Subtract line 12 from line 7 | 13 | 300,000 |
| 14 | Average exchange rate used to convert amounts to U.S. dollars (see instructions) | 14 | |
| 15 | Enter the amount from line 13. If line 13 is stated in functional currency, divide line 13 by line 14 | 15 | 300,000 |
| 16 | Remaining home office deductible expenses on line 15 allocated and apportioned under Regulations section 1.861-8 to ECI (attach computation) | 16 | 150,000 |
| 17 | Enter the amount from line 11. If line 11 is stated in functional currency, divide line 11 by line 14 | 17 | |
| 18 | Total home office deductible expenses allocated and apportioned to ECI. Add lines 16 and 17 | 18 | 150,000 |
| 19 | Total deductible expenses from other non-U.S. locations allocated and apportioned to ECI | 19 | |
| 20 | **Total deductible expenses allocated and apportioned to ECI.** Add lines 18 and 19 and enter the amount here and on Form 1120-F, Section II, line 26 | 20 | 150,000 |

## Part III Allocation and Apportionment Methods and Financial Records Used to Complete Parts I and II

**Note:** Enter the amounts in Part III, lines 21a, 21b, 22a, and 22b in U.S. dollars.

- If one or more methods used are different than in prior year, check box ☐
- If any amount on line 20 is recorded as an interbranch amount on books and records used to prepare Form 1120-F, Schedule L, include the amount on Part IV, line 35 and check this box ☐

| | | | | | |
|---|---|---|---|---|---|
| 21 | Gross income ratio: | | | | |
| a | Gross ECI | 21a | 25,260,000 | | |
| b | Worldwide gross income | 21b | 50,520,000 | | |
| c | Divide line 21a by line 21b | | | 21c | 50 % |
| 22 | Asset ratio: | | | | |
| a | Average U.S. assets from Schedule I, line 5, column (d) | 22a | 500,000,000 | | |
| b | Worldwide assets (if applicable, from Schedule I, line 6b) | 22b | 1,000,000,000 | | |
| c | Divide line 22a by line 22b | | | 22c | 50 % |
| 23 | Number of personnel ratio: | | | | |
| a | Personnel of U.S. trade or business | 23a | 1 | | |
| b | Worldwide personnel | 23b | 3 | | |
| c | Divide line 23a by line 23b | | | 23c | 33 % |

| | | Yes | No |
|---|---|---|---|
| 24 | Did the corporation use any ratio-based methods (other than those indicated on lines 21 through 23 above) in Parts I and II? If "Yes," attach statement (see instructions) | | ✓ |
| 25 | Did the corporation use any other methods (e.g., time-spent analysis or estimates) in Parts I and II? If "Yes," attach statement (see instructions) | | ✓ |

**Part III** **Allocation and Apportionment Methods and Financial Records Used to Complete Parts I and II** *(continued)*

**Note:** Indicate whether the corporation used any of the following financial and other records in Parts I and II to identify deductible expenses allocated and apportioned to ECI.

| | | Yes | No |
|---|---|---|---|
| 26a | Published or other non-public audited financial statements | ✓ | |
| b | Non-audited financial statements | | ✓ |
| 27 | Home office management or other departmental cost accounting reports | | ✓ |
| 28 | Other (e.g., home country regulatory reports or written, contemporaneous functional analyses) (attach statement) | | ✓ |

DRAFT AS OF May 31, 2016 DO NOT FILE

**Part IV** **Allocation and Apportionment of Expenses on Books and Records Used to Prepare Form 1120-F, Schedule L**

**Note:** Enter all amounts in Part IV in U.S. dollars.

| | | | | | |
|---|---|---|---|---|---|
| 29 | Total expenses per books and records used to prepare Form 1120-F, Schedule L | 29 | 17,296,000 | | |
| 30 | Adjustments for U.S. tax principles (attach statement – see instructions) | 30 | (4,296,000) | | |
| 31 | Total deductible expenses. Combine lines 29 and 30 | | | 31 | 13,000,000 |
| 32a | Third-party interest expense included on line 31 | 32a | 12,500,000 | | |
| b | Interbranch interest expense included on line 31 | 32b | | | |
| 33 | Bad debt expense included on line 31 | 33 | | | |
| 34 | Other third-party deductible expenses not allocated or apportioned to ECI and non-ECI under Regulations section 1.861-8 included on line 31 (attach statement) | 34 | | | |
| 35 | Interbranch expenses per books and records included on line 31 and not included on line 32b (attach statement) | 35 | | | |
| 36 | Add lines 32a through 35 | | | 36 | 12,500,000 |
| 37 | Deductible expenses on books and records allocated and apportioned to ECI or non-ECI under Regulations section 1.861-8. Subtract line 36 from line 31 | | | 37 | 500,000 |

| | Reconciliation of allocation and apportionment of deductible expenses to ECI and non-ECI on books and records under Regulations section 1.861-8 (from line 37) | | (a) ECI Amounts | (b) Non-ECI Amounts | (c) Total: Add columns (a) and (b) |
|---|---|---|---|---|---|
| 38a | Derivative transaction deductible expenses definitely related to ECI or non-ECI under Regulations section 1.861-8 (from line 37) | 38a | | | |
| b | Other deductible expenses definitely related to ECI or non-ECI (from line 37) | 38b | 250,000 | | 250,000 |
| 39 | Total deductible expenses definitely related to ECI or non-ECI. Add lines 38a and 38b | 39 | 250,000 | | 250,000 |
| 40 | Other deductible expenses on books and records not definitely related to ECI or non-ECI that are allocated and apportioned to ECI and non-ECI (from line 37) | 40 | | | |
| 41 | Total deductible expenses on books and records allocated and apportioned to ECI and non-ECI. Add lines 39 and 40. Column (c) must equal line 37 | 41 | 250,000 | | 250,000 |

**Note:** Line 41, column (a) is the total of the deductions reported on Form 1120-F, Section II, lines 12, 13, 14, 16, 17, 19 through 25, and 27.

**SCHEDULE I (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# Interest Expense Allocation Under Regulations Section 1.882-5

▶ Attach to Form 1120-F.

▶ Information about Schedule I (Form 1120-F) and its separate instructions is available at *www.irs.gov/form1120f.*

OMB No. 1545-0123

2016

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

**A** Check here if the corporation is a foreign bank as defined in Regulations section 1.882-5(c)(4) . . . . . ▶ ☐

**B** This Schedule I is being completed with respect to *(check one):*

☑ Adjusted U.S. booked liabilities method under Regs. sec. 1.882-5(d). **Complete lines 1 through 15 and 21 through 25.**

☐ Separate currency pools method under Regs. sec. 1.882-5(e). **Complete lines 1 through 9 and 16a through 25.**

DRAFT AS OF June 16, 2016 DO NOT

## Step 1 Average U.S. Assets for the Tax Year: Regulations Section 1.882-5(b)

| | | (a) Set(s) of Books that Give Rise to U.S. Booked Liabilities (see inst.) | (b) Partnership Interests | (c) Set(s) of Books Other than those Described in Columns (a) and (b) | (d) Totals. Add columns (a) through (c) |
|---|---|---|---|---|---|
| 1 | Specify the method used to determine the value of the corporation's U.S. assets on lines 2 through 5 below *(check one):* ☐ Adjusted basis method: Regs. sec. 1.882-5(b)(2)(i) ☑ Fair market value method: Regs. sec. 1.882-5(b)(2)(ii) | | | | |
| 2 | Total assets per books | 1,000,000,000 | | | |
| 3a | Total interbranch assets | | | | |
| b | Total non-ECI assets under section 864(c)(4)(D) | 500,000,000 | | | |
| c | Total other non-ECI assets (attach statement-see instructions) | | | | |
| d | Adjustments for amounts from partnerships and certain disregarded entities included on line 2, column (a) | 10,000,000 | | | |
| e | Adjustments for assets that give rise to direct interest expense allocations under Regs. sec. 1.882-5(a)(1)(ii) | | | | |
| f | Other adjustments to average assets included in line 2 (e.g., mark-to-market differences) | | | | |
| 4 | Combine lines 3a through 3f | 510,000,000 | | | |
| 5 | Total value of U.S. assets for the tax year | 490,000,000 | 10,000,000 | | 500,000,000 |

**Column (a):** Subtract line 4 from line 2.
**Column (b):** See instructions for amount to enter.
**Column (c):** See instructions for amount to enter.

## Step 2 U.S.-Connected Liabilities for the Tax Year: Regulations Section 1.882-5(c)

| | | | |
|---|---|---|---|
| 6 | Specify the method used to determine the amounts in Step 2 *(check one):* ☐ Actual ratio under Regs. sec. 1.882-5(c)(2). **Complete lines 6a through 6c below.** ☐ Fixed ratio under Regs. sec. 1.882-5(c)(4). **Complete line 6d below.** | | |
| a | Average worldwide liabilities | 500,000,000 | |
| b | Average worldwide assets | 1,000,000,000 | |
| c | Divide line 6a by line 6b | 50 % | |
| d | Fixed ratio under Regs. sec. 1.882-5(c)(4). If the corporation is a foreign bank as defined in Regs. sec. 1.882-5(c)(4), enter 95% on line 6d. If the corporation is not a foreign bank or an insurance company, enter 50% on line 6d | % | |
| e | Enter the ratio from line 6c or 6d, as applicable | | 50 % |
| 7a | U.S.-connected liabilities before Regs. sec. 1.884-1(e)(3) election(s). Multiply line 5, column (d) by line 6e | | 250,000,000 |
| b | U.S. liability reduction under Regs. sec. 1.884-1(e)(3) election | | |
| c | **U.S.-Connected Liabilities.** Subtract line 7b from line 7a ▶ | | 250,000,000 |

## Step 3 Interest Expense Paid or Accrued on Average U.S. Booked Liabilities: Regulations Section 1.882-5(d)

| | | (a) Set(s) of Books that Give Rise to U.S. Booked Liabilities (see inst.) | (b) Partnership Interests | (c) Totals. Add columns (a) and (b) |
|---|---|---|---|---|
| 8 | Total average amount of U.S. booked liabilities as defined in Regs. sec. 1.882-5(d)(2) (see instructions) | 245,000,000 | 5,000,000 | 250,000,000 |

**Column (a):** Do not include amounts that give rise to directly allocable interest under Regs. sec. 1.882-5(a)(1)(ii) or from partnerships includible in column (b).
**Column (b):** Enter the portion of the total from Schedule P, line 18 that constitutes U.S. booked liabilities.

## Step 3 (cont.) Interest Expense Paid or Accrued on Average U.S. Booked Liabilities: Regulations Section 1.882-5(d)

| | (a) Set(s) of Books that Give Rise to U.S. Booked Liabilities (see inst.) | (b) Partnership Interests | (c) **Totals.** Add columns **(a)** and **(b)** |
|---|---|---|---|
| **9** Total interest paid or accrued during the tax year on line 8 amount | 12,250,000 | 250,000 | 12,500,000 |

**Column (a):** Do not include amounts that give rise to directly allocable interest under Regs. sec. 1.882-5(a)(1)(ii) or from partnerships includible in column (b).
**Column (b):** Enter the portion of the total from Schedule P, line 15c that is interest on U.S. booked liabilities.

## Step 3 (cont.) Adjusted U.S. Booked Liabilities Method: Regulations Section 1.882-5(d)

**If line 7c is greater than line 8, column (c),** complete lines 10 through 13 below and skip lines 14a and 14b.
**If line 7c is less than or equal to line 8, column (c),** skip lines 10 through 13 and complete lines 14a and 14b.

| | | | | | |
|---|---|---|---|---|---|
| **10** | If the corporation is a foreign bank which is making a current-year election to use the published average 30-day LIBOR (see instructions), check the box on this line, skip lines 10a through 10c, and enter the rate on line 10d ▶ ☐ | | | | |
| **a** | Total interest paid or accrued during the tax year on U.S. dollar liabilities that are **not** U.S. booked liabilities included on line 8 | **10a** | | | |
| **b** | Average U.S. dollar denominated liabilities that are **not** U.S. booked liabilities included on line 8 | **10b** | | | |
| **c** | Divide line 10a by line 10b | **10c** | % | | |
| **d** | Enter the 30-day LIBOR, if elected under Regs. sec. 1.882-5(d)(5)(ii)(B) | **10d** | % | | |
| **e** | Enter the rate from line 10c or, if elected, the 30-day LIBOR on line 10d. See instructions if amount on line 10c is zero | | | **10e** | % |
| **11** | **Excess U.S.-connected liabilities.** Subtract line 8, column (c), from line 7c ▶ | | | **11** | |
| **12** | **Excess interest.** Multiply line 10e by line 11 ▶ | | | **12** | |
| **13** | Add lines 9, column (c) and 12 | | | **13** | |
| **14a** | **Scaling ratio.** Divide line 7c by line 8, column (c) | | | **14a** | 100 % |
| **b** | Multiply line 9, column (c) by line 14a. See instructions for hedging amounts | | | **14b** | 12,500,000 |
| **15** | **Interest expense allocable to ECI under the adjusted U.S. booked liabilities method.** Enter the result from line 13 or line 14b here and on line 21 ▶ | | | **15** | 12,500,000 |

## Step 3 (cont.) Separate Currency Pools Method: Regulations Section 1.882-5(e)

| | | (a) U.S. Dollar Denominated | (b) Home Country Currency. Specify: ▶ | (c) Other Currency. Specify: ▶ | (d) Other Currency. Specify: ▶ |
|---|---|---|---|---|---|
| **16a** | **U.S. assets.** Enter the corporation's U.S. assets, using the methodology in Regs. sec. 1.882-5(e)(1)(i). If more columns are needed, attach statement (see instructions) | | | | |
| **b** | Check here if a less than 3% currency election was made ▶ ☐ | | | | |
| **17a** | Enter the percentage from line 6e | % | % | % | % |
| **b** | **U.S.-connected liabilities.** Multiply line 16a by line 17a, or, if a liability reduction election is made, see instructions | | | | |
| **18a** | Enter the total interest expense paid or accrued for the tax year with respect to the foreign corporation's worldwide liabilities denominated in that foreign currency (enter in functional currency) | | | | |
| **b** | Enter the corporation's average worldwide liabilities (whether interest bearing or not) denominated in that foreign currency (enter in functional currency) | | | | |
| **c** | **Borrowing rate**: Divide line 18a by line 18b | % | % | % | % |
| **19** | **Interest expense allocation by separate currency pool.** Multiply line 17b by line 18c | | | | |
| **20** | **Interest expense allocable to ECI under the separate currency pools method.** Total the amounts on line 19, columns (a) through (d), and amounts from attached statement, if any, and enter the result here and on line 21 | | | | |

DRAFT June 16, 2016 DO NOT FILE

## SUMMARY—Interest Expense Allocation and Deduction under Regulations Section 1.882-5

| | | | | | | |
|---|---|---|---|---|---|---|
| 21 | Amount from line 15 or line 20, as applicable | 21 | 12,500,000 | | | |
| 22 | Enter the corporation's interest expense directly allocable under Regs. sec. 1.882-5(a)(1)(ii). (Include total from Schedule P, line 15b.) | 22 | | | | |
| 23 | **Interest expense allocable to ECI under Regs. sec. 1.882-5.** Add lines 21 and 22 ▶ | | | | 23 | 12,500,000 |
| 24a | Amount of line 23 that is disallowed as a deduction under the Internal Revenue Code or under an income tax treaty (attach statement—see instructions) | 24a | ( ) | | | |
| b | Deferred interest expense included on line 23 or previously deferred and recognized in the current year (attach statement—see instructions) | 24b | | | | |
| c | Amount of line 23 that is capitalized under section 263A (attach statement—see instructions) | 24c | ( ) | | | |
| d | Combine lines 24a through 24c | | | | 24d | |
| 25 | **Total interest expense deduction under Regs. sec. 1.882-5.** Combine lines 23 and 24d and enter here and on Form 1120F, Section II, line 18. The amount entered on line 25 may not exceed the total interest expense paid or accrued by the foreign corporation ▶ | | | | 25 | 12,500,000 |

**Schedule I (Form 1120-F) 2016**

DRAFT AS OF June 16, 2016 DO NOT FILE

**SCHEDULES M-1 and M-2 (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# Reconciliation of Income (Loss) and Analysis of Unappropriated Retained Earnings per Books

▶ Information about Schedules M-1 and M-2 (Form 1120-F) and its instructions is at *www.irs.gov/form1120f*.
▶ Attach to Form 1120-F.

OMB No. 1545-0123

**2016**

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

DRAFT AS OF May 25, 2016 DO NOT FILE

## Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return

**Note.** The corporation may be required to file Schedule M-3 (see instructions).

| | | | | | |
|---|---|---|---|---|---|
| 1 | Net income (loss) per books | | 7 | Income recorded on books this year not included on this return (itemize): | |
| 2 | Federal income tax per books | | a | Tax-exempt interest $ | |
| 3 | Excess of capital losses over capital gains | | b | Other (itemize): | |
| 4 | Income subject to tax not recorded on books this year (itemize): | | 8 | Deductions on this return not charged against book income this year (itemize): | |
| 5 | Expenses recorded on books this year not deducted on this return (itemize): | | a | Depreciation $ | |
| a | Depreciation $ | | b | Charitable contributions $ | |
| b | Charitable contributions $ | | c | Other (itemize): | |
| c | Travel and entertainment $ | | 9 | Add lines 7 and 8 | |
| d | Other (itemize): | | 10 | Income—line 6 less line 9 | |
| 6 | Add lines 1 through 5 | | | | |

## Schedule M-2 Analysis of Unappropriated Retained Earnings per Books

| | | | | | |
|---|---|---|---|---|---|
| 1 | Balance at beginning of year | | 5 | Distributions: a Cash | |
| 2 | Net income (loss) per books | 8,203,100 | | b Stock | |
| 3 | Other increases (itemize): | | | c Property | |
| | | | 6 | Other decreases (itemize): | |
| | | | 7 | Add lines 5 and 6 | |
| 4 | Add lines 1, 2, and 3 | 8,203,100 | 8 | Balance at end of year (line 4 less line 7) | 8,203,100 |

## Who Must File

Generally, any foreign corporation that is required to complete Form 1120-F, Section II must complete Schedules M-1 and M-2 (Form 1120-F). However, the following rules apply.

Do not complete Schedules M-1, M-2, and M-3 if total assets at the end of the tax year (Schedule L, line 17, column (d)) are less than $25,000.

Complete Schedule M-3 in lieu of Schedule M-1 if total assets at the end of the tax year that are reportable on Schedule L are $10 million or more.

A corporation filing Form 1120-F that is not required to file Schedule M-3 may voluntarily file Schedule M-3 instead of Schedule M-1. See the Instructions for Schedule M-3 (Form 1120-F) for more information.

Foreign corporations that **(a)** are required to file a Schedule M-3 (Form 1120-F) and have less than $50 million in total assets at the end of the tax year or **(b)** are not required to file a Schedule M-3 (Form 1120-F) and voluntarily file a Schedule M-3 (Form 1120-F) must either **(1)** complete Schedule M-3 (Form 1120-F) entirely or **(2)** complete Schedule M-3 (Form 1120-F) through Part I and complete Schedule M-1 instead of completing Parts II and III of Schedule M-3 (Form 1120-F). If the foreign corporation chooses **(2)**, then Schedule M-1, line 1 must equal Schedule M-3 (Form 1120-F), Part I, line 11. See the Instructions for Schedule M-3 (Form 1120-F) for more information.

**Note.** If Schedule M-3 is completed in lieu of Schedule M-1, the corporation is still required to complete Schedule M-2.

# Specific Instructions

## Schedule M-1

**Line 1. Net income (loss) per books.** The foreign corporation must report on line 1 of Schedule M-1 the net income (loss) per the set or sets of books taken into account on Schedule L.

**Line 5c. Travel and entertainment expenses.** Include any of the following:

- Meal and entertainment expenses not deductible under section 274(n).
- Expenses for the use of an entertainment facility.
- The part of business gifts over $25.
- Expenses of an individual over $2,000 that are allocable to conventions on cruise ships.
- Employee achievement awards over $400.
- The cost of entertainment tickets over face value (also subject to the 50% limit under section 274(n)).
- The cost of skyboxes over the face value of nonluxury box seat tickets.
- The part of luxury water travel expenses not deductible under section 274(m).
- Expenses for travel as a form of education.
- Other nondeductible travel and entertainment expenses.

**Line 7a. Tax-exempt interest.** Report any tax-exempt interest received or accrued, including any exempt-interest dividends received as a shareholder in a mutual fund or other regulated investment company. Also report this same amount in item P at the top of page 2 of Form 1120-F.

## Schedule M-2

**Line 1. Beginning balance of unappropriated retained earnings.** Enter the beginning balance of unappropriated retained earnings per the set(s) of books taken into account on Schedule L.

**Note.** For additional information for Schedule M-2 reporting, see the Instructions for Schedule M-3 (Form 1120-F).

**SCHEDULE M-3 (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# Net Income (Loss) Reconciliation for Foreign Corporations With Reportable Assets of $10 Million or More

▶ Attach to Form 1120-F.
▶ Information about Schedule M-3 (Form 1120-F) and its instructions is available at *www.irs.gov/form1120f*.

OMB No. 1545-0123

**2016**

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

DRAFT AS OF June 1, 2016 DO NOT FILE

**A** Has the corporation reported taxable income on Form 1120-F, page 3, using a treaty provision to attribute business profits to a U.S. permanent establishment under rules other than section 864(c)? . . . ☐ Yes ☑ No

**B** Did the corporation prepare a non-consolidated, worldwide, certified audited income statement for the period (see instructions)? . . . ☐ Yes ☑ No

**C** Did the corporation prepare a non-consolidated, worldwide income statement for the period (see instructions)? ☑ Yes ☐ No

**D** Did the corporation prepare certified audited income statement(s) for the set(s) of books reported on Form 1120-F, Schedule L? . . . ☑ Yes ☐ No

## Part I Financial Information and Net Income (Loss) Reconciliation (see instructions)

**1** Is the corporation a foreign bank as defined in Regulations section 1.882-5(c)(4)?

☐ **Yes.** Complete the remainder of Part I as follows:
If D is "Yes," use the income statement described in D to complete lines 2 through 5 and 7 through 11.
If D is "No," use the income statement(s) for the set(s) of books reported on Form 1120-F, Schedule L to complete lines 2 through 5 and 7 through 11.

☑ **No.** Complete the remainder of Part I as follows:
If B is "Yes," use the income statement described in B to complete lines 2 through 11.
If B is "No" and C is "Yes," use the income statement described in C to complete lines 2 through 11.
If B and C are "No" and D is "Yes," use the income statement described in D to complete lines 2 through 11.
If B, C, and D are "No," use the income statement described in the instructions to complete lines 2 through 11.

**2a** Enter the income statement period: Beginning 01/01/2016 Ending 12/31/2016

**b** Has the corporation's income statement been restated for the income statement period entered on line 2a?
☐ **Yes.** Attach an explanation and the amount of each item restated.
☑ **No.**

**c** Has the corporation's income statement been restated for any of the 5 income statement periods immediately preceding the period on line 2a?
☐ **Yes.** Attach an explanation and the amount of each item restated.
☑ **No.**

**3** Is any of the corporation's stock publicly traded on any exchange, U.S. or foreign?
☑ **Yes.** List exchange(s) and symbol ▶ London Exchange RMNI
☐ **No.**

| | | | |
|---|---|---|---|
| 4 | Non-consolidated foreign corporation net income (loss) in U.S. dollars from the income statement source identified in line 1 | 4 | 12,230,000 |
| 5a | Net income from includible disregarded foreign entities not included on line 4 (attach statement) | 5a | |
| b | Net loss from includible disregarded foreign entities not included on line 4 (attach statement) | 5b | ( ) |
| c | Net income from includible disregarded U.S. entities not included on line 4 (attach statement) | 5c | |
| d | Net loss from includible disregarded U.S. entities not included on line 4 (attach statement) | 5d | ( ) |
| 6 | Net income (loss) from foreign locations not included on line 4 (attach statement) | 6 | |
| 7a | Net income of non-includible entities (attach statement) | 7a | ( ) |
| b | Net loss of non-includible entities (attach statement) | 7b | |
| 8 | Adjustments to intercompany transactions (attach statement) | 8 | |
| 9 | Adjustments to reconcile income statement period to tax year (attach statement) | 9 | |
| 10 | Other adjustments to reconcile to amount on line 11 (attach statement) | 10 | |
| 11 | **Adjusted financial net income (loss) of non-consolidated foreign corporation.** Combine lines 4 through 10 | 11 | 12,230,000 |

**Note.** Part I, line 11, must equal Part II, line 28, column (a) or Schedule M-1, line 1 (see instructions).

**For Paperwork Reduction Act Notice, see the Instructions for Form 1120-F.**

Cat. No. 39667H

**Schedule M-3 (Form 1120-F) 2016**

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

**Part II** **Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations With Taxable Income per Return** (see instructions)

DRAFT AS OF June 1, 2016 DO NOT FILE

| | Income (Loss) Items | (a) Income (Loss) per Income Statement | (b) Temporary Differences | (c) Permanent Differences | (d) Other Permanent Differences for Allocations to Non-ECI and ECI | (e) Income (Loss) per Tax Return |
|---|---|---|---|---|---|---|
| 1 | Gross receipts | 25,534,000 | (7,500) | | | 25,526,500 |
| 2 | Cost of goods sold (attach statement) | | | | | |
| 3a | Dividends from foreign entities | | | | | |
| b | Dividends from U.S. entities | 13,500 | | | | 13,500 |
| c | Substitute dividend payments received | | | | | |
| 4a | Interest income excluding interest equivalents | 20,000 | | (20,000) | | |
| b | Substitute interest payments received | | | | | |
| c | Interest equivalents not included on line 4b | | | | | |
| 5 | Gross rental income | | | | | |
| 6 | Gross royalty income | | | | | |
| 7 | Fee and commission income | 4,312,900 | | (4,312,900) | | |
| 8 | Income (loss) from equity method corporations | | | | | |
| 9 | Net income (loss) from U.S. partnerships | | | | | |
| 10 | Net income (loss) from certain foreign partnerships (see instructions) | | | | | |
| 11 | Net income (loss) from other pass-through entities (attach statement) | | | | | |
| 12 | Items relating to reportable transactions (attach statement) | | | | | |
| 13 | Hedging transactions | | | | | |
| 14a | Mark-to-market income (loss) under section 475(a) | | | | | |
| b | Mark-to-market income (loss) subject to section 475(d)(3)(B) | | | | | |
| c | Mark-to-market income (loss) under section 475(e) | | | | | |
| d | Mark-to-market income (loss) under section 475(f) | | | | | |
| 15 | Gain (loss) from certain section 988 transactions | | | | | |
| 16a | Interest income from global securities dealing | | | | | |
| b | Dividends from global securities dealing | | | | | |
| c | Gains (losses) and other fixed and determinable, annual, or periodic income from global securities dealing not included on lines 16a and 16b | | | | | |
| 17 | Sales versus lease (for sellers and/or lessors) | | | | | |
| 18 | Section 481(a) adjustments | | | | | |
| 19 | Unearned/deferred revenue | | | | | |
| 20 | Original issue discount, imputed interest, and phantom income | | | | | |
| 21a | Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities | | | | | |
| b | Gross capital gains from Schedule D, excluding amounts from pass-through entities | | | | | |

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

**Part II** **Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations With Taxable Income per Return** (see instructions) *(continued from page 2)*

DRAFT AS OF June 1, 2016 DO NOT FILE

| | Income (Loss) Items | (a) Income (Loss) per Income Statement | (b) Temporary Differences | (c) Permanent Differences | (d) Other Permanent Differences for Allocations to Non-ECI and ECI | (e) Income (Loss) per Tax Return |
|---|---|---|---|---|---|---|
| 21c | Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses | | | | | |
| d | Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses | | | | | |
| e | Abandonment losses | | | | | |
| f | Worthless stock losses (attach statement) | | | | | |
| g | Other gain/loss on disposition of assets other than inventory | | | | | |
| 22 | Capital loss limitation and carryforward used | | | | | |
| 23 | Gross effectively connected income of foreign banks from books that do not give rise to U.S. booked liabilities | | | | | |
| 24 | Other income (loss) items with differences (attach statement) | (333,500) | | 33,500 | | (300,000) |
| 25 | **Total income (loss) items.** Combine lines 1 through 24 | 29,546,900 | (7,500) | (4,299,400) | | 25,240,000 |
| 26 | **Total expense/deduction items** (from Part III, line 33) | (17,316,900) | | (16,816,900) | 12,400,000 | (12,900,000) |
| 27 | Other items with no differences | | | | | |
| 28 | **Reconciliation totals.** Combine lines 25 through 27 | 12,230,000 | (7,500) | (12,517,500) | 12,400,000 | 12,340,000 |

**Note.** Line 28, column (a), must equal Part I, line 11, and column (e) must equal Form 1120-F, page 3, line 29.

**Part III** **Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations With Taxable Income per Return** (see instructions)

| | Expense/Deduction Items | (a) Expense per Income Statement | (b) Temporary Differences | (c) Permanent Differences | (d) Other Permanent Differences for Allocations to Non-ECI and ECI | (e) Deduction per Tax Return |
|---|---|---|---|---|---|---|
| 1 | U.S. current income tax expense | 4,316,900 | | (4,316,900) | | |
| 2 | U.S. deferred income tax expense | | | | | |
| 3 | Non-U.S. current income tax expense (other than foreign withholding taxes) | | | | | |
| 4 | Non-U.S. deferred income tax expense | | | | | |
| 5 | Non-U.S. withholding taxes | | | | | |
| 6 | Compensation with section 162(m) limitation | | | | | |
| 7 | Salaries and other base compensation | 500,000 | | | (250,000) | 250,000 |
| 8 | Stock option expense | | | | | |
| 9 | Other equity-based compensation | | | | | |
| 10 | Meals and entertainment | | | | | |
| 11 | Fines and penalties | | | | | |
| 12 | Judgments, damages, awards, and similar costs | | | | | |

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

**Part III** **Reconciliation of Net Income (Loss) per Income Statement of Non-Consolidated Foreign Corporations With Taxable Income per Return** (see instructions) *(continued from page 3)*

DRAFT AS OF June 1, 2016 DO NOT FILE

| | Expense/Deduction Items | (a) Expense per Income Statement | (b) Temporary Differences | (c) Permanent Differences | (d) Other Permanent Differences for Allocations to Non-ECI and ECI | (e) Deduction per Tax Return |
|---|---|---|---|---|---|---|
| 13 | Pension and profit-sharing | | | | | |
| 14 | Other post-retirement benefits | | | | | |
| 15 | Deferred compensation | | | | | |
| 16 | Charitable contributions | | | | | |
| 17 | Domestic production activities deduction | | | | | |
| 18 | Current year acquisition or reorganization investment banking fees, legal and accounting fees | | | | | |
| 19 | Current year acquisition/reorganization other costs | | | | | |
| 20 | Amortization/impairment of goodwill | | | | | |
| 21 | Amortization of acquisition, reorganization, and start-up costs | | | | | |
| 22 | Other amortization or impairment write-offs | | | | | |
| 23 | Depreciation | | | | | |
| 24 | Bad debt expense | | | | | |
| 25 | Purchase versus lease (for purchasers and/or lessees) | | | | | |
| 26a | Interest expense per books | 12,500,000 | | (12,500,000) | | |
| b | Interest expense under Regulations section 1.882-5 (from Schedule I (Form 1120-F), line 23) | | | | 12,500,000 | 12,500,000 |
| c | Regulations section 1.882-5 allocation amount subject to deferral or disallowance (from Schedule I (Form 1120-F), line 24d) | | | ( ) | | |
| d | Substitute interest payments | | | | | |
| e | Interest equivalents (e.g., guarantee fees) not included on line 26d | | | | | |
| 27 | Substitute dividend payments | | | | | |
| 28 | Fee and commission expense | | | | | |
| 29 | Rental expense | | | | | |
| 30 | Royalty expense | | | | | |
| 31 | Expenses allocable to effectively connected income under Regulations section 1.861-8 from home office or other books that do not give rise to U.S. booked liabilities (from Schedule H (Form 1120-F), line 20) | | | | 150,000 | 150,000 |
| 32 | Other expense/deduction items with differences (attach statement) | | | | | |
| 33 | **Total expense/deduction items.** Combine lines 1 through 32. Enter here and on Part II, line 26 | 17,316,900 | | (16,816,900) | 12,400,000 | 12,900,000 |

**SCHEDULE P (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# List of Foreign Partner Interests in Partnerships

▶ Attach to Form 1120-F.

▶ Information about Schedule P (Form 1120-F) and its separate instructions is available at *www.irs.gov/form1120f.*

OMB No. 1545-0123

**2016**

Name of corporation (foreign partner): RMN Incorporated

Employer identification number (EIN): 00-0000600

DRAFT AS OF May 26, 2016 DO NOT FILE

## Part I List of Foreign Partner Interests in Partnerships

| | (a) Name of partnership | (b) Address | (c) EIN | (d) For each partnership interest, is the foreign corporation's distributive share ECI, or treated as ECI, in whole or in part, with a U.S. trade or business determined under section 875 (see instructions)? |
|---|---|---|---|---|
| A | ABC Financial Services | 123 Wall St., NY, NY 10005 | 00-1234567 | ☐ Yes ☑ No |
| B | | | | ☐ Yes ☐ No |
| C | | | | ☐ Yes ☐ No |
| D | | | | ☐ Yes ☐ No |

**Note.** *If the corporation has more than 4 partnership interests, continue on a separate page. See instructions.*

## Part II Foreign Partner Income and Expenses: Reconciliation to Schedule K-1 (Form 1065) See instructions if reconciling to Schedule K-1 (Form 1065-B).

| | | Schedules K-1 A | B | C | D | Total |
|---|---|---|---|---|---|---|
| 1 | Net income (loss) reported on lines 1 through 3, Schedule K-1 | 250,000 | | | | 250,000 |
| 2 | Gross income included on lines 1 through 3, Schedule K-1 | 500,000 | | | | 500,000 |
| 3 | Gross effectively connected income (ECI) on lines 1 through 3, Schedule K-1 | 500,000 | | | | 500,000 |
| 4 | Non-interest expenses on lines 1 through 3, Schedule K-1 | | | | | |
| 5 | Non-interest expenses on lines 1 through 3, Schedule K-1, allocated to gross ECI | | | | | |
| 6 | Net income (loss) reported on Schedule K-1, other than on lines 1 through 3 | | | | | |
| 7 | Other gross income reported on Schedule K-1 | | | | | |
| 8 | Other gross ECI reported on Schedule K-1 | | | | | |
| 9 | Other non-interest expenses reported on Schedule K-1 | | | | | |
| 10 | Other non-interest expenses reported on Schedule K-1, allocated to gross ECI | | | | | |
| 11 | **Total gross income.** Add lines 2 and 7 | 500,000 | | | | 500,000 |
| 12 | **Total gross effectively connected income.** Add lines 3 and 8 | 500,000 | | | | 500,000 |
| 13 | Interest expense on lines 1 through 3, Schedule K-1 | 250,000 | | | | 250,000 |
| 14 | Other interest expense reported on Schedule K-1, lines 13 and 18 | | | | | |
| 15a | **Total interest expense.** Add lines 13 and 14 | 250,000 | | | | 250,000 |
| b | Interest expense directly allocable under Regulations section 1.882-5(a)(1)(ii)(B). (**Note.** Include the line 15b total on Schedule I, line 22.) | | | | | |
| c | Subtract line 15b from line 15a. (**Note.** Enter the portion of the line 15c total that constitutes interest on U.S. booked liabilities on Schedule I, line 9, column (b).) | 250,000 | | | | 250,000 |

**Part III** **Foreign Partner's Average Outside Basis Under Regulations sections 1.882-5(b) and 1.884-1(d)(3)**

**Schedules K-1**

| | | A | B | C | D | Total |
|---|---|---|---|---|---|---|
| **16** | Section 705 outside basis . . . . | 10,000,000 | | | | 10,000,000 |
| **17a** | Partner's liabilities included in outside basis under section 752 that give rise to directly allocable interest expense under Regulations section 1.882-5(a)(1)(ii)(B) . . . . . | 5,000,000 | | | | 5,000,000 |
| **b** | All other liabilities included in partner's outside basis under section 752 . . . | | | | | |
| **c** | Add lines 17a and 17b . . . . . | 5,000,000 | | | | 5,000,000 |
| **d** | Subtract line 17c from line 16 . . . | 5,000,000 | | | | 5,000,000 |
| **18** | Partner's liabilities under Regulations section 1.884-1(d)(3)(vi). (**Note.** Enter the portion of the line 18 total on Schedule I, line 8, column (b) that represents U.S. booked liabilities under Regulations section 1.882-5(d).) . . | 5,000,000 | | | | 5,000,000 |
| **19** | **Partner's outside basis under Regulations section 1.884-1(d)(3)(vi).** Add lines 17d and 18 . . . . . | 10,000,000 | | | | 10,000,000 |
| **20** | Partner's outside basis allocable to ECI under Regulations section 1.884-1(d)(3)(i) and 1.882-5. (**Note.** The line 20 total should generally be entered on Schedule I, line 5, column (b). However, see the instructions for Schedule I, line 5, column (b) before entering an amount on that line.) | 10,000,000 | | | | 10,000,000 |
| **21** | Enter "income" or "asset" to indicate the allocation method used on line 20 (see instructions) . . . . . | ASSET | | | | |

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**SCHEDULE S (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# Exclusion of Income From the International Operation of Ships or Aircraft Under Section 883

▶ Attach to Form 1120-F.

▶ Information about Schedule S (Form 1120-F) and its separate instructions is at *www.irs.gov/form1120f.*

OMB No. 1545-0123

2016

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

DRAFT AS OF June 1, 2016 DO NOT FILE

## Part I Qualified Foreign Corporation

**1a** Enter the name of the qualified foreign country in which the foreign corporation was organized ▶ Australia

**b** Check one (and only one) of the following boxes to indicate the type of equivalent exemption granted by the foreign country listed on line 1a above:

- ☑ Domestic law
- ☐ Exchange of notes
- ☐ Income tax convention

**c** Enter the applicable authority (i.e., the specific provision) of the equivalent exemption type indicated on line 1b (see instructions) ▶

**2** Enter the gross income in each of the following categories of qualified income for which the exemption is being claimed:
**Note.** If an amount is not readily determinable, enter a reasonable estimate. If an estimate is used on any of the lines below, check here ▶ ☑

| | | | |
|---|---|---|---|
| a | Income from the carriage of passengers and cargo | 2a | |
| b | Time or voyage (full) charter income of a ship or wet lease income of an aircraft | 2b | |
| c | Bareboat charter income of a ship or dry lease income of an aircraft | 2c | 250,000 |
| d | Incidental bareboat charter income of a ship or incidental dry lease income of an aircraft | 2d | |
| e | Incidental container-related income | 2e | |
| f | Income incidental to the international operation of ships or aircraft other than incidental income included on lines 2d and 2e above | 2f | |
| g | Capital gains derived by a qualified foreign corporation engaged in the international operation of ships or aircraft from the sale, exchange or other disposition of a ship, aircraft, container or related equipment or other moveable property used by that qualified foreign corporation in the international operation of ships or aircraft | 2g | |
| h | Income from participation in a pool, partnership, strategic alliance, joint operating agreement, code-sharing arrangement, international operating agency, or other joint venture described in Regulations section 1.883-1(e)(2) | 2h | |

**Stock ownership test of Regulations section 1.883-1(c)(2):**

**3** Check one (and only one) of the following boxes to indicate the test under which the stock ownership test of Regulations section 1.883-1(c)(2) was satisfied:

- ☐ The publicly-traded test of Regulations section 1.883-2(a). **Complete Part II.**
- ☑ The CFC stock ownership test of Regulations section 1.883-3(a). **Complete Part III.**
- ☐ The qualified shareholder stock ownership test of Regulations section 1.883-4(a). **Complete Part IV.**

**4** Check the box if any of the shares of the foreign corporation's stock or the stock of any direct, indirect, or constructive shareholder are issued in bearer form ☐

**5** If the box on line 4 is checked:

**a** Check the box on this line 5a if none of the bearer shares (other than bearer shares maintained in a dematerialized or immobilized book-entry system) were relied on to satisfy any of the stock ownership tests described in Regulations section 1.883-1(c)(2) ☐

**b** Check the box on this line 5b if any of the bearer shares were maintained in a dematerialized or immobilized book-entry system and were relied on to satisfy any of the stock ownership tests described in Regulations section 1.883-1(c)(2) ☐

## Part II Stock Ownership Test for Publicly-Traded Corporations

**6** Enter the name of the country in which the stock is primarily traded ▶

**7** Enter the name of the securities market(s) on which the stock is listed ▶

**8** Enter a description of each class of stock relied on to meet the "regularly traded test" of Regulations section 1.883-2(d) (see instructions for description requirements) ▶

**9** Do one or more 5% shareholders (see instructions for definition) own in the aggregate 50% or more of the vote and value of the outstanding shares of any class of stock for more than half the number of days during the tax year? **Yes** ☐ **No** ☐

If "Yes," complete line 10.
If "No," skip line 10.

**10** For each class of stock relied on to meet the "regularly traded test" of Regulations section 1.883-2(d), indicate:

**a** **(i)** The days during the tax year of the corporation in which the class of stock was closely held, without regard to the exception in Regulations section 1.883-2(d)(3)(ii) ▶

**(ii)** The total percentage of the vote and value of the class of stock that is owned by 5% shareholders during such days ▶ %

**b** For all qualified shareholders on which the corporation intends to rely to satisfy the closely-held exception test of Regulations section 1.883-2(d)(3)(ii), and who own stock in the closely-held block (directly, indirectly, or by applying the attribution rules of Regulations section 1.883-4(c)), enter:

**(i)** The total number of qualified shareholders, as defined in Regulations section 1.883-4(b)(1) ▶

**(ii)** The total percentage of the value of the shares of the class of stock owned, directly or indirectly, by such qualified shareholders by country of residence (see instructions):

| Country code (see instructions) | Percentage |
|---|---|
| | |
| | |
| | |
| | |

**(iii)** The days during the tax year of the corporation that such qualified shareholders owned, directly or indirectly, their shares in the closely-held block of stock ▶

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## Part III Stock Ownership Test for Controlled Foreign Corporations (CFC)

**11a** Enter the percentage of the value of all outstanding shares of the CFC that is owned by all "qualified U.S. persons" identified in the qualified ownership statements required under Regulations section 1.883-3(c)(2), applying the attribution of ownership rules of Regulations section 1.883-3(b)(4) ▶ 50 %

**b** Enter the percentage of the value of all outstanding shares of the CFC that is owned by the "qualified U.S. persons" referred to on line 11a above as bearer shares maintained in a dematerialized or immobilized book-entry system ▶ %

**12** Enter the period during which such qualified U.S. persons held such stock (see instructions) ▶
January 1, 2016 through December 31, 2016

**13** Enter the period during which the foreign corporation was a CFC (see instructions) ▶
January 1, 2016 through December 31, 2016

**14** Is the CFC directly held by qualified U.S. persons? . . . . . **Yes** ☑ **No** ☐

## Part IV Qualified Shareholder Stock Ownership Test

**15** Check the box if more than 50% of the value of the outstanding shares of the corporation is owned (or treated as owned by reason of Regulations section 1.883-4(c)) by qualified shareholders for each category of income for which the exemption is claimed . . . . . ☐

**16** With respect to all qualified shareholders relied on to satisfy the 50% ownership test of Regulations section 1.883-4(a):

**a** Enter the total number of such qualified shareholders as defined in Regulations section 1.883-4(b)(1) ▶

**b** Enter the total percentage of the value of the outstanding shares owned, applying the attribution rules of Regulations section 1.883-4(c), by such qualified shareholders by country of residence or organization, whichever is applicable:

| Country code (see instructions) | Percentage |
|---|---|
| | |
| | |
| | |
| | |
| | |
| Total | |

**c** Enter the percentage of the value of the outstanding shares that is owned by the qualified shareholders as bearer shares maintained in a dematerialized or immobilized book-entry system ▶ %

**d** Enter the period during the tax year of the foreign corporation that such stock was held by qualified shareholders ▶

**SCHEDULE V (Form 1120-F)**

Department of the Treasury
Internal Revenue Service

# List of Vessels or Aircraft, Operators, and Owners

▶ Attach to Form 1120-F.

▶ Information about Schedule V (Form 1120-F) and its separate instructions is at *www.irs.gov/form1120f.*

OMB No. 1545-0123

2016

Name of corporation: RMN Incorporated

Employer identification number: 00-0000600

Provide the information requested on lines 1 through 9 for each vessel or aircraft with respect to which the corporation is subject to a 4% rate of tax under section 887.

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| | | A | B | C | D |
|---|---|---|---|---|---|
| 1 | Name of vessel or type of aircraft | Jill | Jack | | |
| 2 | Vessel or aircraft ID number | 00-0000700 | 00-0000100 | | |
| 3 | Was the vessel or aircraft chartered in? | ☑ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| 4 | Was the vessel or aircraft chartered out? | ☑ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| 5 | Name of registered owner | Nam | Benimble | | |
| 6 | EIN or SSN of registered owner | 00-0000800 | 00-0000200 | | |
| 7 | Name of operator | Nam Corp | Jack B Quick | | |
| 8 | EIN or SSN of operator | 00-0000900 | 00-0000300 | | |
| 9 | U.S. source gross transportation income | 250,000 | 0 | | |

| | | | |
|---|---|---|---|
| 10 | **Total U.S. source gross transportation income.** Add the amounts on line 9, columns A through D (and the amounts on line 9 of any attached continuation statements) | 10 | 250,000 |
| 11 | Amount of line 10 that is exempt by treaty (attach Form 8833) | 11 | |
| 12 | Subtract line 11 from line 10. Enter the result here and on Form 1120-F, Section I, line 9, column (b) | 12 | 250,000 |

**For Paperwork Reduction Act Notice, see the Instructions for Form 1120-F.** Cat. No. 50821R **Schedule V (Form 1120-F) 2016**

**SCHEDULE UTP (Form 1120)**

Department of the Treasury
Internal Revenue Service

# Uncertain Tax Position Statement

▶ **File with Form 1120, 1120-F, 1120-L, or 1120-PC.**
▶ **Information about Schedule UTP (Form 1120) and its separate instructions is at *www.irs.gov/scheduleutp*.**

OMB No. 1545-0123

**2016**

Name of entity as shown on page 1 of tax return: RMN Incorporated

**EIN of entity**: 00-0000600

This Part I, Schedule UTP (Form 1120) is page 1 of 1 Part I pages.

DRAFT AS OF June 29, 2016 DO NOT FILE

**Part I** **Uncertain Tax Positions for the Current Tax Year.** See instructions for how to complete columns (a) through (g). Enter, in Part III, a description for each uncertain tax position (UTP).

Check this box if the corporation was unable to obtain information from related parties sufficient to determine whether a tax position is a UTP. See instructions. ▶ ☐

| (a) UTP No. | (b) Primary IRC Sections (for example, "61","108", "263A") / Primary IRC Subsections (for example, (f)(2)(A)(ii)) | | | (c) Timing Codes (check if Permanent, Temporary, or both) | | (d) Pass-Through Entity EIN | (e) Major Tax Position | (f) Ranking of Tax Position | (g) Reserved for Future Use |
|---|---|---|---|---|---|---|---|---|---|
| C | 482 ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | ✓ | T | - | ✓ | G1 | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |
| C | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | |

Name of entity as shown on page 1 of tax return | **EIN of entity**

This Part II, Schedule UTP (Form 1120) is page _____ of _____ Part II pages.

**Part II** **Uncertain Tax Positions for Prior Tax Years.**

See instructions for how to complete columns (a) through (h). Enter, in Part III, a description for each uncertain tax position (UTP).

Check this box if the corporation was unable to obtain information from related parties sufficient to determine whether a tax position is a UTP. See instructions. ▶ ☐

DRAFT AS OF June 29, 2016 FOR FILE

| (a) UTP No. | (b) Primary IRC Sections (for example, "61", "108", "263A") / Primary IRC Subsections (for example, (f)(2)(A)(ii)) | | | (c) Timing Codes (check if Permanent, Temporary, or both) | | (d) Pass-Through Entity EIN | (e) Major Tax Position | (f) Ranking of Tax Position | (g) Reserved for Future Use | (h) Year of Tax Position |
|---|---|---|---|---|---|---|---|---|---|---|
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |
| P | ( )( )( )( ) | ( )( )( )( ) | ( )( )( )( ) | P | T | - | ☐ | | | |

| Name of entity as shown on page 1 of tax return | EIN of entity |
|---|---|
| RMN Incorporated | 00-0000600 |

This Part III, Schedule UTP (Form 1120) is page 1 of 1 Part III pages.

**Part III** **Concise Descriptions of UTPs.** Indicate the corresponding UTP number from Part I, column (a) (for example, C1) or Part II column (a) (for example, P2). Use as many Part III pages as necessary. See instructions.

| UTP No. | Concise Description of Uncertain Tax Position |
|---|---|
| 1 | We recently transferred international franchising rights to our newly formed Canadian affiliate. We do not believe these franchise rights have any value at this time; however, a position could be raised that the rights have a fair market value greater than zero which would require an intercompany royalty payment. |

DRAFT AS OF June 29, 2016 DO NOT FILE

Form **1125-E**
(Rev. October 2016)
Department of the Treasury
Internal Revenue Service

# Compensation of Officers

▶ **Attach to Form 1120, 1120-C, 1120-F, 1120-REIT, 1120-RIC, or 1120S.**
▶ **Information about Form 1125-E and its separate instructions is at *www.irs.gov/form1125e*.**

OMB No. 1545-0123

Name: RMN Incorporated

**Employer identification number:** 00-0000600

**Note:** Complete Form 1125-E only if total receipts are $500,000 or more. See instructions for definition of total receipts.

DRAFT AS OF June 24, 2016 DO NOT FILE

| (a) Name of officer | (b) Social security number (see instructions) | (c) Percent of time devoted to business | Percent of stock owned (d) Common | (e) Preferred | (f) Amount of compensation |
|---|---|---|---|---|---|
| 1 Samuel L Booken | 999-00-0002 | 50 % | 10 % | % | 250,000 |
| | | % | % | % | |
| | | % | % | % | |
| | | % | % | % | |
| | | % | % | % | |
| | | % | % | % | |
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| | | % | % | % | |
| | | % | % | % | |
| | | % | % | % | |

| | | | |
|---|---|---|---|
| 2 | Total compensation of officers | 2 | 250,000 |
| 3 | Compensation of officers claimed on Form 1125-A or elsewhere on return | 3 | |
| 4 | Subtract line 3 from line 2. Enter the result here and on Form 1120, page 1, line 12 or the appropriate line of your tax return | 4 | 250,000 |

**For Paperwork Reduction Act Notice, see separate instructions.** Cat. No. 55989C Form **1125-E** (Rev. 10-2016)

Form **4626**

Department of the Treasury
Internal Revenue Service

# Alternative Minimum Tax—Corporations

▶ **Attach to the corporation's tax return.**
▶ **Information about Form 4626 and its separate instructions is at *www.irs.gov/form4626*.**

OMB No. 1545-0123

**2016**

Name: RMN Incorporated

**Employer identification number**: 00-0000600

DRAFT AS OF August 17, 2016 DO NOT FILE

**Note:** *See the instructions to find out if the corporation is a small corporation exempt from the alternative minimum tax (AMT) under section 55(e).*

| | | | | | |
|---|---|---|---|---|---|
| 1 | Taxable income or (loss) before net operating loss deduction | | | 1 | 12,334,000 |
| 2 | **Adjustments and preferences:** | | | | |
| a | Depreciation of post-1986 property | | | 2a | |
| b | Amortization of certified pollution control facilities | | | 2b | |
| c | Amortization of mining exploration and development costs | | | 2c | |
| d | Amortization of circulation expenditures (personal holding companies only) | | | 2d | |
| e | Adjusted gain or loss | | | 2e | |
| f | Long-term contracts | | | 2f | |
| g | Merchant marine capital construction funds | | | 2g | |
| h | Section 833(b) deduction (Blue Cross, Blue Shield, and similar type organizations only) | | | 2h | |
| i | Tax shelter farm activities (personal service corporations only) | | | 2i | |
| j | Passive activities (closely held corporations and personal service corporations only) | | | 2j | |
| k | Loss limitations | | | 2k | |
| l | Depletion | | | 2l | |
| m | Tax-exempt interest income from specified private activity bonds | | | 2m | |
| n | Intangible drilling costs | | | 2n | |
| o | Other adjustments and preferences | | | 2o | |
| 3 | Pre-adjustment alternative minimum taxable income (AMTI). Combine lines 1 through 2o | | | 3 | 12,334,000 |
| 4 | **Adjusted current earnings (ACE) adjustment:** | | | | |
| a | ACE from line 10 of the ACE worksheet in the instructions | 4a | 12,334,000 | | |
| b | Subtract line 3 from line 4a. If line 3 exceeds line 4a, enter the difference as a negative amount. See instructions | 4b | 0 | | |
| c | Multiply line 4b by 75% (0.75). Enter the result as a positive amount. | 4c | 0 | | |
| d | Enter the excess, if any, of the corporation's total increases in AMTI from prior year ACE adjustments over its total reductions in AMTI from prior year ACE adjustments. See instructions. **Note:** *You **must** enter an amount on line 4d (even if line 4b is positive)* | 4d | 0 | | |
| e | ACE adjustment. • If line 4b is zero or more, enter the amount from line 4c • If line 4b is less than zero, enter the **smaller** of line 4c or line 4d as a negative amount | | | 4e | 0 |
| 5 | Combine lines 3 and 4e. If zero or less, stop here; the corporation does not owe any AMT | | | 5 | 12,334,000 |
| 6 | Alternative tax net operating loss deduction. See instructions | | | 6 | |
| 7 | **Alternative minimum taxable income.** Subtract line 6 from line 5. If the corporation held a residual interest in a REMIC, see instructions | | | 7 | 12,334,000 |
| 8 | **Exemption phase-out** (if line 7 is $310,000 or more, skip lines 8a and 8b and enter -0- on line 8c): | | | | |
| a | Subtract $150,000 from line 7 (if completing this line for a member of a controlled group, see instructions). If zero or less, enter -0- | 8a | | | |
| b | Multiply line 8a by 25% (0.25) | 8b | | | |
| c | Exemption. Subtract line 8b from $40,000 (if completing this line for a member of a controlled group, see instructions). If zero or less, enter -0- | | | 8c | 0 |
| 9 | Subtract line 8c from line 7. If zero or less, enter -0- | | | 9 | 12,334,000 |
| 10 | Multiply line 9 by 20% (0.20) | | | 10 | 2,466,800 |
| 11 | Alternative minimum tax foreign tax credit (AMTFTC). See instructions | | | 11 | |
| 12 | Tentative minimum tax. Subtract line 11 from line 10 | | | 12 | 2,466,800 |
| 13 | Regular tax liability before applying all credits except the foreign tax credit | | | 13 | 4,316,800 |
| 14 | **Alternative minimum tax.** Subtract line 13 from line 12. 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 | | | 14 | 0 |

**For Paperwork Reduction Act Notice, see separate instructions.**

Cat. No. 12955I Form **4626** (2016)

Form **5472**

(Rev. December 2012)

Department of the Treasury
Internal Revenue Service

# Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business

**(Under Sections 6038A and 6038C of the Internal Revenue Code)**

▶ **Information about Form 5472 and its separate instructions is at *www.irs.gov/form5472.***

For tax year of the reporting corporation beginning _____, _____, and ending _____, _____

**Note.** *Enter all information in English and money items in U.S. dollars.*

OMB No. 1545-0805

## Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

**1a** Name of reporting corporation: RMN Incorporated

**1b Employer identification number:** 00-0000600

Number, street, and room or suite no. (if a P.O. box, see instructions): 1234 Main Street

**1c** Total assets: $ 500,000,000

City or town, state, and ZIP code (if a foreign address, see instructions): Sydney, Victoria, Australia 30000

**1d** Principal business activity ▶ Limousine Service

**1e** Principal business activity code ▶ 485320

**1f** Total value of gross payments made or received (see instructions) reported on **this** Form 5472: $ 2,000,000

**1g** Total number of Forms 5472 filed for the tax year: 1

**1h** Total value of gross payments made or received (see instructions) reported on **all** Forms 5472: $ 2,000,000

**1i** Check here if this is a consolidated filing of Form 5472 ▶ ☐

**1j** Country of incorporation: Australia

**1k** Country(ies) under whose laws the reporting corporation files an income tax return as a resident: Australia

**1l** Principal country(ies) where business is conducted: Australia

**2** Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of **(a)** the total voting power of all classes of the stock of the reporting corporation entitled to vote, or **(b)** the total value of all classes of stock of the reporting corporation ▶ ☐

## Part II 25% Foreign Shareholder (see instructions)

**1a** Name and address of direct 25% foreign shareholder: RLO Finance Group, 6 Rue de la Taxes, Paris, France 01234

**1b(1)** U.S. identifying number, if any: APPLD FOR

**1b(2)** Reference ID number (see instructions): 12345678901234

**1c** Principal country(ies) where business is conducted: France

**1d** Country of citizenship, organization, or incorporation: France

**1e** Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident: France

**2a** Name and address of direct 25% foreign shareholder:

**2b(1)** U.S. identifying number, if any:

**2b(2)** Reference ID number (see instructions):

**2c** Principal country(ies) where business is conducted:

**2d** Country of citizenship, organization, or incorporation:

**2e** Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident:

**3a** Name and address of ultimate indirect 25% foreign shareholder:

**3b(1)** U.S. identifying number, if any:

**3b(2)** Reference ID number (see instructions):

**3c** Principal country(ies) where business is conducted:

**3d** Country of citizenship, organization, or incorporation:

**3e** Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident:

**4a** Name and address of ultimate indirect 25% foreign shareholder:

**4b(1)** U.S. identifying number, if any:

**4b(2)** Reference ID number (see instructions):

**4c** Principal country(ies) where business is conducted:

**4d** Country of citizenship, organization, or incorporation:

**4e** Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident:

**For Paperwork Reduction Act Notice, see instructions.**

Cat. No. 49987Y Form **5472** (Rev. 12-2012)

**Part III** **Related Party** (see instructions)

Check applicable box: Is the related party a ☑ foreign person or ☐ U.S. person?

All reporting corporations must complete this question and the rest of Part III.

| | |
|---|---|
| **1a** Name and address of related party<br>Viva Financial, Rue de la Rue, 100, Paris, France 01234 | **1b(1)** U.S. identifying number, if any<br>APPLD FOR<br>**1b(2)** Reference ID number (see instructions)<br>43210987654321 |
| **1c** Principal business activity ▶ Financial | **1d** Principal business activity code ▶ 523900 |
| **1e** Relationship—Check boxes that apply: ☑ Related to reporting corporation ☐ Related to 25% foreign shareholder ☐ 25% foreign shareholder | |
| **1f** Principal country(ies) where business is conducted<br>France | **1g** Country(ies) under whose laws the related party files an income tax return as a resident<br>France |

**Part IV** **Monetary Transactions Between Reporting Corporations and Foreign Related Party** (see instructions)

**Caution:** *Part IV* ***must*** *be completed if the "foreign person" box is checked in the heading for Part III.*

If estimates are used, check here ▶ ☐

| | | | |
|---|---|---|---|
| 1 | Sales of stock in trade (inventory) | 1 | |
| 2 | Sales of tangible property other than stock in trade | 2 | |
| 3 | Platform contribution transaction payments received | 3 | |
| 4 | Cost sharing transaction payments received | 4 | |
| 5a | Rents received (for other than intangible property rights) | 5a | |
| b | Royalties received (for other than intangible property rights) | 5b | |
| 6 | Sales, leases, licenses, etc., of intangible property rights (e.g., patents, trademarks, secret formulas) | 6 | |
| 7 | Consideration received for technical, managerial, engineering, construction, scientific, or like services | 7 | |
| 8 | Commissions received | 8 | 2,000,000 |
| 9 | Amounts borrowed (see instructions) **a** Beginning balance _____ **b** Ending balance or monthly average ▶ | 9b | |
| 10 | Interest received | 10 | |
| 11 | Premiums received for insurance or reinsurance | 11 | |
| 12 | Other amounts received (see instructions) | 12 | |
| 13 | **Total.** Combine amounts on lines 1 through 12 | 13 | 2,000,000 |
| 14 | Purchases of stock in trade (inventory) | 14 | |
| 15 | Purchases of tangible property other than stock in trade | 15 | |
| 16 | Platform contribution transaction payments paid | 16 | |
| 17 | Cost sharing transaction payments paid | 17 | |
| 18a | Rents paid (for other than intangible property rights) | 18a | |
| b | Royalties paid (for other than intangible property rights) | 18b | |
| 19 | Purchases, leases, licenses, etc., of intangible property rights (e.g., patents, trademarks, secret formulas) | 19 | |
| 20 | Consideration paid for technical, managerial, engineering, construction, scientific, or like services | 20 | |
| 21 | Commissions paid | 21 | |
| 22 | Amounts loaned (see instructions) **a** Beginning balance _____ **b** Ending balance or monthly average ▶ | 22b | |
| 23 | Interest paid | 23 | |
| 24 | Premiums paid for insurance or reinsurance | 24 | |
| 25 | Other amounts paid (see instructions) | 25 | |
| 26 | **Total.** Combine amounts on lines 14 through 25 | 26 | |

**Part V** **Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party** (see instructions)

Describe these transactions on an attached separate sheet and check here. ▶ ☐

**Part VI** **Additional Information**

All reporting corporations must complete Part VI.

| | | | |
|---|---|---|---|
| 1 | Does the reporting corporation import goods from a foreign related party? | ☐ Yes | ☑ No |
| 2a | If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods? | ☐ Yes | ☐ No |
| | If "No," **do not** complete **b** and **c** below. | | |
| b | If "Yes," attach a statement explaining the reason or reasons for such difference. | | |
| c | If the answers to questions 1 and 2a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472? | ☐ Yes | ☐ No |
| 3 | During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement? | ☐ Yes | ☐ No |
| 4 | During the course of the tax year, did the foreign parent corporation become a participant in any cost sharing arrangement? | ☐ Yes | ☐ No |

Form **8453-I**

Department of the Treasury
Internal Revenue Service

# Foreign Corporation Income Tax Declaration for an IRS *e-file* Return

**File electronically with the corporation's tax return. Do not file paper copies.**

**▶ Information about Form 8453-I and its instructions is at *www.irs.gov/form8453i.***

For calendar year 2016, or tax year beginning , 2016, ending , 20

OMB No. 1545-0123

**2016**

Name of corporation: RMN Incorporated

**Employer identification number:** 00-0000600

DRAFT AS OF June 3, 2016 DO NOT FILE

**Part I** **Tax Return Information** (Whole dollars only)

| | | | |
|---|---|---|---|
| 1 | Total income (Form 1120-F, Section II, line 11) | 1 | 25,240,000 |
| 2 | Taxable income (Form 1120-F, Section II, line 31) | 2 | 12,334,000 |
| 3 | Total tax (Form 1120-F, Schedule J, line 9) | 3 | 4.316,000 |
| 4 | Amount owed (Form 1120-F, page 1, line 7) | 4 | |
| 5a | Overpayment (Form 1120-F, page 1, line 8a) | 5a | 151,630 |
| b | Overpayment resulting from tax deducted and withheld under Chapters 3 and 4 (Form 1120-F, page 1, line 8b) | 5b | 5,000 |

**Part II** **Declaration of Officer** (see instructions) **Be sure to keep a copy of the corporation's tax return.**

**6a** ☐ I consent that the corporation's refund be directly deposited as designated on the **Form 8302,** Electronic Deposit of Tax Refund of $1 Million or More, that will be electronically transmitted with the corporation's 2016 federal income tax return.

**b** ☑ I do not want direct deposit of the corporation's refund **or** the corporation is not receiving a refund.

**c** ☐ I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the corporation's federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at **1-888-353-4537** no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment.

If the corporation is filing a balance due return, I understand that if the IRS does not receive full and timely payment of its tax liability, the corporation will remain liable for the tax liability and all applicable interest and penalties.

Under penalties of perjury, I declare that I am an officer of the above corporation and that the information I have given my electronic return originator (ERO), transmitter, and/or intermediate service provider (ISP) and the amounts in Part I above agree with the amounts on the corresponding lines of the corporation's 2016 federal income tax return. To the best of my knowledge and belief, the corporation's return is true, correct, and complete. I consent to my ERO, transmitter, and/or ISP sending the corporation's return, this declaration, and accompanying schedules and statements to the IRS. I also consent to the IRS sending my ERO, transmitter, and/or ISP an acknowledgment of receipt of transmission and an indication of whether or not the corporation's return is accepted, and, if rejected, the reason(s) for the rejection. If the processing of the corporation's return or refund is delayed, I authorize the IRS to disclose to my ERO, transmitter, and/or ISP the reason(s) for the delay, or when the refund was sent.

**Sign Here**

▶ Signature of officer | Date | ▶ Chief Financial Officer
Title

**Part III** **Declaration of Electronic Return Originator (ERO) and Paid Preparer** (see instructions)

I declare that I have reviewed the above corporation's return and that the entries on Form 8453-I are complete and correct to the best of my knowledge. If I am only a collector, I am not responsible for reviewing the return and only declare that this form accurately reflects the data on the return. The corporate officer will have signed this form before I submit the return. I will give the officer a copy of all forms and information to be filed with the IRS, and have followed all other requirements in **Pub. 3112,** IRS *e-file* Application and Participation, and **Pub. 4163,** Modernized e-File (MeF) Information for Authorized IRS *e-file* Providers for Business Returns. If I am also the Paid Preparer, under penalties of perjury I declare that I have examined the above corporation's return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. This Paid Preparer declaration is based on all information of which I have any knowledge.

**ERO's Use Only**

| | | | | |
|---|---|---|---|---|
| ERO's signature ▶ | Date | Check if also paid preparer ☑ | Check if self-employed ☐ | ERO's SSN or PTIN P00000007 |
| Firm's name (or yours if self-employed), address, and ZIP code ▶ AAA Tax Service<br>4000 3rd Avenue, Suite 100, Portland, OR 97201 | | EIN 00-0000300<br>Phone no. 000-123-4567 | | |

Under penalties of perjury, I declare that I have examined the above corporation's return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. This declaration is based on all information of which I have any knowledge.

**Paid Preparer Use Only**

| | | | | |
|---|---|---|---|---|
| Print/Type preparer's name | Preparer's signature | Date | Check ☐ if self-employed | PTIN |
| Firm's name ▶ | | | Firm's EIN ▶ | |
| Firm's address ▶ | | | Phone no. | |

**For Privacy Act and Paperwork Reduction Act Notice, see instructions.**

Cat. No. 49728F Form **8453-I** (2016)

Form 1120-F TY2016 Test Scenario 7

Form **1042-S**

Department of the Treasury
Internal Revenue Service

**Foreign Person's U.S. Source Income Subject to Withholding**

▶ Information about Form 1042-S and its separate instructions is at *www.irs.gov/form1042s.*

**2016**

OMB No. 1545-0096

**Copy C** for Recipient

Attach to any Federal tax return you file

☐ **AMENDED** ☐ **PRO-RATA BASIS REPORTING**

| | | | | |
|---|---|---|---|---|
| **1** Income code: 03 | **2** Gross income: 20,000 | **3** Chapter indicator. Enter "3" or "4": 3 | | **13e** Recipient's U.S. TIN, if any: 00-0000600 |
| | | **3a** Exemption code | **4a** Exemption code | |
| | | **3b** Tax rate: 20 . 0 | **4b** Tax rate: 00 . 00 | **13f** Ch. 3 status code: 15 / **13g** Ch. 4 status code: 38 |
| **5** Withholding allowance | | | | **13h** Recipient's GIIN / **13i** Recipient's foreign tax identification number, if any / **13j** LOB code |
| **6** Net income | | | | |
| **7a** Federal tax withheld: 4,000 | | | **7b** Check if tax not deposited with IRS pursuant to escrow procedure ☐ | |
| **8** Tax withheld by other agents | | | | **13k** Recipient's account number / **13l** Recipient's date of birth |
| **9** Tax paid by withholding agent | | | | |
| **10** Total withholding credit | | | | **14a** Primary Withholding Agent's Name (if applicable) |
| **11** Amount repaid to recipient | | | | **14b** Primary Withholding Agent's EIN |
| **12a** Withholding agent's EIN: 00-0000006 | **12b** Ch. 3 status code: 02 | **12c** Ch. 4 status code: 02 | | **15a** Intermediary or flow-through entity's EIN, if any / **15b** Ch. 3 status code / **15c** Ch. 4 status code |
| **12d** Withholding agent's name: Greatland Industries | | | | **15d** Intermediary or flow-through entity's name |
| **12e** Withholding agent's Global Intermediary Identification Number (GIIN): ABC123.ZZZZ.ME.840 | | | | **15e** Intermediary or flow-through entity's GIIN |
| **12f** Country code | **12g** Foreign taxpayer identification number, if any | | | **15f** Country code / **15g** Foreign tax identification number, if any |
| **12h** Address (number and street): 1234 Marsh Lane | | | | **15h** Address (number and street) |
| **12i** City or town, state or province, country, ZIP or foreign postal code: Duluth, GA 30096 | | | | **15i** City or town, state or province, country, ZIP or foreign postal code |
| **13a** Recipient's name: RMN Incorporated | **13b** Recipient's country code: AS | | | **16a** Payer's name / **16b** Payer's TIN |
| **13c** Address (number and street): 1234 Main Street | | | | **16c** Payer's GIIN / **16d** Ch. 3 status code / **16e** Ch. 4 status code |
| **13d** City or town, state or province, country, ZIP or foreign postal code: Sydney, Victoria, Australia 30000 | | | | **17a** State income tax withheld / **17b** Payer's state tax no. / **17c** Name of state |

Form **1042-S** (2016)

Form 1120-F TY2016 Test Scenario 7

Form **1042-S**

Department of the Treasury
Internal Revenue Service

**Foreign Person's U.S. Source Income Subject to Withholding**

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**2016**

OMB No. 1545-0096

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☐ **AMENDED** ☐ **PRO-RATA BASIS REPORTING**

| | | | | |
|---|---|---|---|---|
| **1** Income code: 06 | **2** Gross income: 6,665 | **3** Chapter indicator. Enter "3" or "4": 3 | | **13e** Recipient's U.S. TIN, if any: 00-0000600 |
| | | **3a** Exemption code | **4a** Exemption code | |
| | | **3b** Tax rate 30 . 00 | **4b** Tax rate 00 . 00 | **13f** Ch. 3 status code: 15 / **13g** Ch. 4 status code: 38 |
| **5** Withholding allowance | | | | **13h** Recipient's GIIN / **13i** Recipient's foreign tax identification number, if any / **13j** LOB code |
| **6** Net income | | | | |
| **7a** Federal tax withheld: 2,000 | | | **7b** Check if tax not deposited with IRS pursuant to escrow procedure ☐ | |
| **8** Tax withheld by other agents | | | | **13k** Recipient's account number / **13l** Recipient's date of birth |
| **9** Tax paid by withholding agent | | | | |
| **10** Total withholding credit | | | | **14a** Primary Withholding Agent's Name (if applicable) |
| **11** Amount repaid to recipient | | | | **14b** Primary Withholding Agent's EIN |
| **12a** Withholding agent's EIN: 00-0000007 | **12b** Ch. 3 status code: 02 | **12c** Ch. 4 status code: 02 | | **15a** Intermediary or flow-through entity's EIN, if any / **15b** Ch. 3 status code / **15c** Ch. 4 status code |
| **12d** Withholding agent's name: Workforce Enterprises Inc. | | | | **15d** Intermediary or flow-through entity's name |
| **12e** Withholding agent's Global Intermediary Identification Number (GIIN): DEF456.ZZZZ.ME.840 | | | | **15e** Intermediary or flow-through entity's GIIN |
| **12f** Country code | **12g** Foreign taxpayer identification number, if any | | | **15f** Country code / **15g** Foreign tax identification number, if any |
| **12h** Address (number and street): 999 Doe Road | | | | **15h** Address (number and street) |
| **12i** City or town, state or province, country, ZIP or foreign postal code: Cambridge, MD 21871 | | | | **15i** City or town, state or province, country, ZIP or foreign postal code |
| **13a** Recipient's name: RMN Incorporated | **13b** Recipient's country code: AS | | | **16a** Payer's name / **16b** Payer's TIN |
| **13c** Address (number and street): 1234 Main Street | | | | **16c** Payer's GIIN / **16d** Ch. 3 status code / **16e** Ch. 4 status code |
| **13d** City or town, state or province, country, ZIP or foreign postal code: Sydney, Victoria, Australia 30000 | | | | **17a** State income tax withheld / **17b** Payer's state tax no. / **17c** Name of state |

Form **1042-S** (2016)

Form 1120-F TY2016 Test Scenario 7

Form **1042-S**

Department of the Treasury
Internal Revenue Service

**Foreign Person's U.S. Source Income Subject to Withholding**

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**2016**

OMB No. 1545-0096

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☐ **AMENDED** ☐ **PRO-RATA BASIS REPORTING**

| | | | | |
|---|---|---|---|---|
| **1** Income code: 12 | **2** Gross income: 40,000 | **3** Chapter indicator. Enter "3" or "4": 3 | | **13e** Recipient's U.S. TIN, if any: 00-0000600 |
| | | **3a** Exemption code | **4a** Exemption code | |
| | | **3b** Tax rate 10 . 00 | **4b** Tax rate 00 . 00 | **13f** Ch. 3 status code: 15 / **13g** Ch. 4 status code: 38 |
| **5** Withholding allowance | | | | **13h** Recipient's GIIN / **13i** Recipient's foreign tax identification number, if any / **13j** LOB code |
| **6** Net income | | | | |
| **7a** Federal tax withheld: 4,000 | | **7b** Check if tax not deposited with IRS pursuant to escrow procedure ☐ | | |
| **8** Tax withheld by other agents | | | | **13k** Recipient's account number / **13l** Recipient's date of birth |
| **9** Tax paid by withholding agent | | | | |
| **10** Total withholding credit | | | | **14a** Primary Withholding Agent's Name (if applicable) |
| **11** Amount repaid to recipient | | | | **14b** Primary Withholding Agent's EIN |
| **12a** Withholding agent's EIN: 00-0000012 | **12b** Ch. 3 status code: 02 | **12c** Ch. 4 status code: 02 | | **15a** Intermediary or flow-through entity's EIN, if any / **15b** Ch. 3 status code / **15c** Ch. 4 status code |
| **12d** Withholding agent's name: Green Leaf Inc. | | | | **15d** Intermediary or flow-through entity's name |
| **12e** Withholding agent's Global Intermediary Identification Number (GIIN): GHI789.ZZZZ.ME.840 | | | | **15e** Intermediary or flow-through entity's GIIN |
| **12f** Country code | **12g** Foreign taxpayer identification number, if any | | | **15f** Country code / **15g** Foreign tax identification number, if any |
| **12h** Address (number and street): 555 Oak Avenue | | | | **15h** Address (number and street) |
| **12i** City or town, state or province, country, ZIP or foreign postal code: Madison, TN 37115 | | | | **15i** City or town, state or province, country, ZIP or foreign postal code |
| **13a** Recipient's name: RMN Incorporated | **13b** Recipient's country code: AS | | | **16a** Payer's name / **16b** Payer's TIN |
| **13c** Address (number and street): 1234 Main Street | | | | **16c** Payer's GIIN / **16d** Ch. 3 status code / **16e** Ch. 4 status code |
| **13d** City or town, state or province, country, ZIP or foreign postal code: Sydney, Victoria, Australia 30000 | | | | **17a** State income tax withheld / **17b** Payer's state tax no. / **17c** Name of state |

Form **1042-S** (2016)

Form 1120-F TY2016 Test Scenario 7

Form **1042-S**

Department of the Treasury
Internal Revenue Service

**Foreign Person's U.S. Source Income Subject to Withholding**

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**2016**

OMB No. 1545-0096

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☐ **AMENDED** ☐ **PRO-RATA BASIS REPORTING**

| | | | | |
|---|---|---|---|---|
| **1** Income code: 14 | **2** Gross income: 50,000 | **3** Chapter indicator. Enter "3" or "4": 3 | | **13e** Recipient's U.S. TIN, if any: 00-0000600 |
| | | **3a** Exemption code | **4a** Exemption code | |
| | | **3b** Tax rate: 40 . 00 | **4b** Tax rate: 00 . 00 | **13f** Ch. 3 status code: 15 / **13g** Ch. 4 status code: 38 |
| **5** Withholding allowance | | | | **13h** Recipient's GIIN / **13i** Recipient's foreign tax identification number, if any / **13j** LOB code |
| **6** Net income | | **7b** Check if tax not deposited with IRS pursuant to escrow procedure ☐ | | |
| **7a** Federal tax withheld: 20,000 | | | | |
| **8** Tax withheld by other agents | | | | **13k** Recipient's account number / **13l** Recipient's date of birth |
| **9** Tax paid by withholding agent | | | | |
| **10** Total withholding credit | | | | **14a** Primary Withholding Agent's Name (if applicable) |
| **11** Amount repaid to recipient | | | | **14b** Primary Withholding Agent's EIN |
| **12a** Withholding agent's EIN: 00-0000008 | **12b** Ch. 3 status code: 02 | **12c** Ch. 4 status code: 02 | | **15a** Intermediary or flow-through entity's EIN, if any / **15b** Ch. 3 status code / **15c** Ch. 4 status code |
| **12d** Withholding agent's name: Goldfish inc. | | | | **15d** Intermediary or flow-through entity's name |
| **12e** Withholding agent's Global Intermediary Identification Number (GIIN): JKL012.ZZZZ.ME.840 | | | | **15e** Intermediary or flow-through entity's GIIN |
| **12f** Country code | **12g** Foreign taxpayer identification number, if any | | | **15f** Country code / **15g** Foreign tax identification number, if any |
| **12h** Address (number and street): 4321 Pond Lane | | | | **15h** Address (number and street) |
| **12i** City or town, state or province, country, ZIP or foreign postal code: Newcomb, OH 43832 | | | | **15i** City or town, state or province, country, ZIP or foreign postal code |
| **13a** Recipient's name: RMN Incorporated | **13b** Recipient's country code: AS | | | **16a** Payer's name / **16b** Payer's TIN |
| **13c** Address (number and street): 1234 Main Street | | | | **16c** Payer's GIIN / **16d** Ch. 3 status code / **16e** Ch. 4 status code |
| **13d** City or town, state or province, country, ZIP or foreign postal code: Sydney, Victoria, Australia 30000 | | | | **17a** State income tax withheld / **17b** Payer's state tax no. / **17c** Name of state |

Form **1042-S** (2016)