

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

OMB No. 1545-0123

Go to www.irs.gov/Form5471 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by
section 898) (see instructions) beginning , 20 , and ending , 20

Attachment
Sequence No. **121**

Name of person filing this return	A Identifying number
Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)	B Category of filer (See instructions. Check applicable box(es)). 1a <input type="checkbox"/> 1b <input type="checkbox"/> 1c <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5a <input type="checkbox"/> 5b <input type="checkbox"/> 5c <input type="checkbox"/>
City or town, state, and ZIP code	C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period %

Filer's tax year beginning , 20 , and ending , 20

D Check box if this is a final Form 5471 for the foreign corporation ☐

E Check if any excepted specified foreign financial assets are reported on this form (see instructions) ☐

F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 ☐

G If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)

H Person(s) on whose behalf this information return is filed

(1) Name	(2) Address	(3) Identifying number	(4) Check applicable box(es)		
			Shareholder	Officer	Director
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars

Form 5471 Guide

Peipei Pang



Form 5471 Guide:

Instructions for Form 5471 United States. Internal Revenue Service,1990 *Larry's 2011 Tax Guide for U.S. Expats & Green Card Holders....in User-Friendly English!* Laurence E. 'Larry' Lipsher,2013-05-22 There has not been anything written about U S Taxation matters that apply to U S Expats in over a decade until now Larry Lipsher s new book is written especially for the American taxpayer who lives and works outside of the U S Tax year 2010 places a whole new set of tax rules regulations and laws into operation with two major tax acts passed by Congress and signed into law by the President FATCA the Foreign Accounts Tax Compliance Act will forever impact how Americans will do their banking and what they will have to report in detail for matters they were not required to report upon in the past Lipsher a popular commentator of taxes in Asia for well over a decade writes to get laughs from a subject that usually generates far more tears than laughter He is brief and very much to the point concentrating upon making a boring subject as interesting as possible Larry's 2013 Tax Guide for U. S. Expats and Green Card Holders in User-Friendly English Laurence E. 'Larry',2013-03 A guide for the overseas American tax filer written especially for people who hate taxes **Larry's 2016 U.S. Tax Guide 'Supplement' for U.S. Expats, Green Card Holders and Non-Resident Aliens in User Friendly English** Laurence E. 'Larry' Lipsher,2016-03-02 This is a very user friendly guide for the U S tax filer who lives outside of the United States but is still required to file his or her U S tax return on an annual basis This book explains in an easy informal and frequently humorous manner what the tax filer s requirements are and pitfalls to look out for to avoid what could otherwise be harsh penalties Asian Tax Review s Laurence E Lipsher has written six prior annual books updating and expanding upon topics about the expat filer should be aware Lipsher has spoken about taxes all over the world and is a popular tax entertainer In addition this year s book also includes Nine Essays from a Transpacific Rock n Tax Man a mini memoir covering the author s years in the rock music business overcoming a cocaine addiction to become a wine industry tax expert and going through the weirdest manifestation of a mid life crisis by starting all over again twenty five years ago as an American accountant in the People s Republic of China A Practical Guide to U.S. Taxation of International Transactions Robert E. Meldman,Michael Schadewald,2000-06-22 This book discusses basis principles tax jurisdiction source of income rules U S taxation of foreign income foreign tax credit transfer pricing anti avoidance provisions governing foreign corporations foreign sales corporations foreign currency translation and transactions tax treaties planning of foreign operations and U S taxation of foreign persons foreign persons investing in the U S and foreign persons doing business in the U S *Limited Liability Companies* Robert W. Wood,2001-01-01 Written by a team of experts this book explains conversions of existing partnerships and corporations to limited liability companies with in depth legal tax and practical implications It also details procedures from start to finish including knowing when to use how to form and how to dissolve limited liability companies with federal tax treatment of each step Topics discussed include comparing LLCs to S Corporations and Partnerships and exploring the reasons LLCs may want

to elect to be taxed as corporations forming the LLC withholding taxes on payments to foreign LLCs converting accounting and law firms to LLPs dissolution and liquidation and more *Internal Revenue Bulletin* United States. Internal Revenue Service,1990 *The McGraw-Hill Guide to Acquiring and Divesting Businesses* Edward E. Shea,1999 Organized logically and structured for maximum usability The McGraw Hill Guide to Acquiring and Divesting Businesses guides you step by step through the merger and acquisition process Each chapter begins with basic information for readers new to the field or who want to refresh their recollections The chapter then progresses to intermediate and advanced subjects and finally provides references to sources where readers can obtain further information Whether you are knee deep in an ongoing deal becoming involved in the initial stages of a purchase or acquisition or just need to prepare for the future The McGraw Hill Guide to Acquiring and Divesting Businesses will be your most useful M A reference source *A Practical Guide to U. S. Taxation of International Transactions* Robert Meldman,Michael S. Schadewald,1997 Discusses two fundamental principles of US taxation of international transactions i e tax jurisdiction and the source of income rules Explains how the US taxes the foreign activities of domestic corporations US citizens and other US persons Includes chapters on the foreign tax credit the deemed paid foreign tax credit transfer pricing controlled foreign corporations foreign sales corporations and income tax treaties Describes how the US taxes the US activities of foreign corporations non resident alien individuals and other foreign persons

The Guide to Foreign Investment in United States Real Estate Timothy D. Richards,1984 **Practical Guide to U.S. Transfer Pricing** Robert T. Cole,1999 Practical Guide to U S Transfer Pricing is a total approach to U S transfer pricing For The complex global marketplace No book on the market today offers you a more thorough approach to transfer pricing rules that Practical Guide to U S Transfer Pricing The tremendous increase in international trade among the nations of the world has made transfer pricing the most important international tax issues for governments Thus it is a major problem for major multinational corporations which are subject to detriments from transfer pricing rules and adjustments especially double taxation penalties And The cost of compliance Packed with ready to use guidelines detailed examples and useful tips Practical Guide to U S Transfer Pricing has been specifically designed to help you make today s transfer pricing rules work for your corporation The book brings together For The first time a wealth of features that will empower you to deal quickly and efficiently with all transfer pricing issues and problems You will find Unsurpassed coverage of U S transfer pricing substantive rules Incisive comparisons of the U S rules To The international accepted OECD Transfer Pricing Guidelines Information on both special and traditional procedures for transfer pricing cases Comprehensive explanations of all major transfer pricing methods such as the Comparable Uncontrolled Price Method Cost Plus Method Comparable Profits Methods and Profit Split Method Criteria for choosing the best transfer pricing method Ideas on how to cope with the U S rules in light of foreign requirements A checklist that multinationals can use in developing an international strategy for transfer pricing compliance A full description of the proposed method of global trading of financial products *Instructions*

for Form 5471 United States. Internal Revenue Service,1988 *Study Guide to Accompany Wft Corporations, Partnerships, Estates and Trusts* 1999 William Hoffman,Public Education Committee William Hoffman,Bill Raabe,Jim Smith,David Maloney,1998-05-19 Written specifically for the student who needs help understanding the difficult concepts in the Corporations Partnerships Estates Trust Taxation course The Study Guide contains a chapter review of key concepts and self evaluation tests *The Ultimate Tax Planning Guide for Growing Companies* Robert W. Wood,1991 Corporate Counsel's Guide to Laws of International Trade ,2010 *Kleinrock's Total Tax Guide* ,2006 *Real Estate Tax Guide* Martin J. Greenberg,Nicholas J. Wood,1988 Export Handbook Robert Feinschreiber,1997-01-17 With the passage of GATT and NAFTA trade barriers worldwide have been reduced or eliminated This book provides legal accounting and tax strategies for those entering or already participating in the lucrative area of exports **2001 U. S. Master Tax Guide** C C H, Incorporated,2001-08 *The S Corporation Handbook* ,2005

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terminations, and tighteners. □ Explain the use of slings and sling arrangements. □ ... Answers 3 See Student Book answer to Question 5. (above) although there are no ... b iron: malleable and magnetic (other answers are possible). 8 a both are metals as ... Ironworkers : Occupational Outlook Handbook Align structural and reinforcing iron and steel vertically and horizontally, using tag lines, plumb bobs, lasers, and levels; Connect iron and steel with bolts, ... Rigger Level I and Rigger Level II A Certified Rigger Level I can perform simple, repetitive rigging tasks when the load weight, center of gravity, the rigging, and rigging configuration are ... Hoisting & Rigging Fundamentals The material outlined in this manual outlines the requirements of the DOE Hoisting and. Rigging program. It requires persons who perform rigging or operate ...