

From: "jeffrey E." <jeevacation@gmail.com>

To: Jeffrey Epstein <jeevacation@gmail.com>

Subject:

Date: Tue, 29 Nov 2016 22:38:23 +0000

"u.s. shareholders" of a CFC are required to file Form 5471 with their personal tax return, even if the CFC has no subpart F income. Form 926 is used to report transfers of property (including cash) to a foreign corporation. Since a foreign corporation will have some kind of foreign bank or financial account, the U.S. shareholders who have control, signatory authority or a financial interest, over the account must file Form TD F 90-22.1 by June 30th of the year after the calendar year. If the foreign corporation's shareholders have made an election to have the corporation treated as a disregarded (non-corporate) entity for U.S. tax purposes, then the shareholders must file a Form 8865 for a foreign partnership and a Form 8858 for a foreign disregarded entity. In order to make an election to be treated as a disregarded entity, a Form 8832 must be filed. If the foreign corporation has made an investment in any passive foreign investment companies, or if the foreign corporation is a PFIC, then the U.S. shareholders may be required to file a Form 8621 to report their share of the income of the PFIC or the gain on any dispositions of PFIC shares. If the Foreign Corporation has any U.S.-source income, it will need to file a Form 1120-F. If it is a Foreign Sales Corporation, it will need to file a Form 1120-FSC. In the event of the purchase or sale of a foreign corporation, the buyer and seller will need to file a Form 8883, which is an Asset Allocation Statement. If the shareholders or the corporation rely on a treaty that overrides a provision of the IRC, a Form 8833 must be filed to reflect a Treaty Based Return Position. Depending on the nature of the business of the corporation, other forms may be required

--

please note

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of JEE

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved