

# Inclusion of Deferred Foreign Income Upon Transition to Participation Exemption System

▶ Attach to tax return.

▶ Go to [www.irs.gov/Form965](http://www.irs.gov/Form965) for instructions and the latest information.

For calendar year 20 , or other tax year beginning , 20 , and ending , 20 , of the filer.

Name of person filing this return Identifying number

**Note:** Throughout this form, the term "2019 tax year" refers to 2019 calendar tax years and fiscal tax years of the person filing this return that begin in 2019.

### Part I Section 965(a) Inclusion

1	Reserved . . . . .	1	
2	Reserved . . . . .	2	
3	<b>2019 tax year section 965(a) inclusions from pass-throughs.</b> Enter the sum here and on your tax return as follows. Corporations: Enter the line 3 total on Form 1120, Schedule C, line 15, column (a), or the corresponding line of other corporate tax returns. All others: See instructions . . . . . ▶	3	
4	Reserved . . . . .	4	
5	Reserved . . . . .	5	
6	Reserved . . . . . ▶	6	

### Part II Section 965(c) Deduction

7	Reserved . . . . .	7	
8	Reserved . . . . .	8	
9	Reserved . . . . .	9	
10	Reserved . . . . .	10	
11	Reserved . . . . .	11	
12	Reserved . . . . .	12	
13	Reserved . . . . .	13	
14	Reserved . . . . .	14	
15	Reserved . . . . .	15	
16	Reserved . . . . .	16	
17	<b>2019 tax year section 965(c) deduction from pass-throughs.</b> Enter the sum here and on your tax return as follows. Corporations: Enter the line 17 total on Form 1120, Schedule C, line 15, column (c), or the corresponding line of other corporate tax returns. All others: See instructions . . . . .	17	

### Part III Elections

		Yes	No
A	Was an election made to pay the net tax liability over 8 years as provided for in section 965(h)? . . . . .		
B	Complete if a shareholder in an S corporation. Was an election made to defer payment of net tax liability as provided for in section 965(i)? . . . . .		
C	Complete if a Real Estate Investment Trust. Was an election made to include income over 8 years as provided for in section 965(m)? . . . . .		
D	Was an election made not to apply a net operating loss deduction as provided in section 965(n)? . . . . .		
E	Was the election provided for in Regulations section 1.965-2(f)(2) made? . . . . .		