SCHEDULE J
(Form 5471)
(Rev. December 2020)
Department of the Treasury
Internal Revenue Service

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

► **Attach to Form 5471.**
► **Go to *www.irs.gov/Form5471* for instructions and the latest information.**

OMB No. 1545-0123

Name of person filing Form 5471		**Identifying number**
Name of foreign corporation	EIN (if any)	**Reference ID number** (see instructions)

a Separate Category (Enter code - see instructions.) . . . . ►

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . ►

Part I Accumulated E&P of Controlled Foreign Corporation

☐ Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

Important: Enter amounts in functional currency.		**(a)** Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	**(b)** Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	**(c)** Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	**(d)** Hovering Deficit and Deduction for Suspended Taxes	**(e)** Previously Taxed E&P (see instructions) (***i***) Reclassified section 965(a) PTEP	**(e)** (***ii***) Reclassified section 965(b) PTEP
1a	Balance at beginning of year (as reported on prior year Schedule J)						
b	Beginning balance adjustments (attach statement)						
c	Adjusted beginning balance (combine lines 1a and 1b) . .						
2a	Reduction for taxes unsuspended under anti-splitter rules						
b	Disallowed deduction for taxes suspended under anti-splitter rules						
3	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H)						
4	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation						
5a	E&P carried over in nonrecognition transaction						
b	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction						
6	Other adjustments (attach statement)						
7	Total current and accumulated E&P (combine lines 1c through 6)						
8	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P						
9	Actual distributions						
10	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P						
11	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
12	Other adjustments (attach statement)						
13	Hovering deficit offset of undistributed post-transaction E&P (see instructions)						
14	Balance at beginning of next year (combine lines 7 through 13) . .						