

Consent Agreement Under Section 965(i)(4)(D)

OMB No. 1545-0123

File in Duplicate
(see *When and Where To File*
in the separate instructions)

► Go to www.irs.gov/Form965 for instructions and the latest information.

Part I Shareholder Information

Name of Shareholder

Taxpayer identification number

Address (number, street, room, suite, or P.O. box number)

City or town, state or province, country, and ZIP or foreign postal code

Part II Identifying Information of the S Corporation (with respect to which the section 965(i) election was in effect)

Name

Taxpayer identification number

Part III Triggering Event Under Section 965(i)(2)(A)(ii) Giving Rise to Need for Consent

- 1 Enter the date of the triggering event ►
- 2 Provide a detailed description of the triggering event that gave rise to the need for consent to make a section 965(h) election:

Part IV Report of Unpaid Section 965(i) Net Tax Liability for Which Consent Is Requested Under Section 965(i)(4)(D) for a Section 965(h) Election To Be Made

- 3 Enter the amount of the section 965(i) net tax liability remaining unpaid with respect to which the section 965(h) election will be made \$
- 4 Enter the date on which the next installment payment will be due ►

Part V Shareholder's Ability To Make Payments Required Under Section 965(h)

- 5 Is the shareholder able to make the payments required under section 965(h) and Regulations section 1.965-7(b) with respect to the unpaid net tax liability reported on line 3? ☐ Yes ☐ No
- 6 Did the leverage ratio (see instructions) of the shareholder, immediately after the triggering event, exceed 3:1? ☐ Yes ☐ No
- 7 Provide any additional information pertaining to the shareholder's ability to pay (see instructions):
