

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

OMB No. 1545-0123

► Attach to tax return.

► Go to www.irs.gov/Form965 for instructions and the latest information.Attachment
Sequence No. **76****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 "2020 tax year" refers to 2020 calendar tax years and fiscal tax years of the person filing this return that begin in 2020.**Part I Section 965(a) Inclusion**

| | | | |
|----------|--|----------|--|
| 1 | Reserved | 1 | |
| 2 | Reserved | 2 | |
| 3 | 2020 tax year section 965(a) inclusions from pass-throughs. 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 | 2020 tax year section 965(c) deduction from pass-throughs. 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? | | |

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.Form **965** (Rev. 1-2021)