

**Part I Accumulated E&P of Controlled Foreign Corporation (continued)**

		(e) Previously Taxed E&P (see instructions)						(f)	
		(iii) Section 965(b)(4)(A) (section 959(c)(1)(A))	(iv) Section 951A Inclusion (section 959(c)(1)(A))	(v) Earnings Invested in Excess Passive Assets (section 959(c)(1)(B))	(vi) Subpart F Income (section 959(c)(2))	(vii) Section 965(a) Inclusion (section 959(c)(2))	(viii) Section 965(b)(4)(A) (section 959(c)(2))	(ix) Section 951A Inclusion (section 959(c)(2))	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(ix))
1a									
1b									
1c									
2a									
2b									
3									
4									
5a									
5b									
6									
7									
8									
9									
10									
11									
12									
13									
14									

**Part II Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))**

Enter amounts in functional currency.

1	Balance at beginning of year	▲
2	Additions (amounts subject to future recapture)	▲
3	Subtractions (amounts recaptured in current year)	▲
4	Balance at end of year (combine lines 1 through 3)	▲