

## 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.**

<b>For calendar year 20</b> _____, <b>or other tax year beginning</b> _____, <b>20</b> _____ <b>and ending</b> _____, <b>20</b> _____ <b>of the filer.</b>	
Name of person filing this return	Identifying number

**Note.** Throughout this form, the term “2018 tax year” refers to 2018 calendar tax years and fiscal tax years of the person filing this return that begin in 2018. The term “2017 tax year” refers to 2017 calendar tax years and fiscal tax years of the person filing this return that begin in 2017.

**Part I Section 965(a) Inclusion**

<b>1</b>	<b>2018 tax year section 965(a) inclusion amounts from Schedule A.</b> Enter the sum of column (k) of Schedule A . . . . .	<b>1</b>	
<b>2</b>	<b>2018 tax year section 965(a) inclusions from pass-throughs.</b> Attach schedule . . . . .	<b>2</b>	
<b>3</b>	<b>Total 2018 tax year section 965(a) inclusion.</b> Add lines 1 and 2. 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 . . . . . ▶	<b>3</b>	
<b>4</b>	<b>2017 tax year section 965(a) inclusion amounts from Schedule A.</b> Enter the sum of column (j) of Schedule A . . . . .	<b>4</b>	
<b>5</b>	<b>2017 tax year section 965(a) inclusions from pass-throughs.</b> Attach schedule . . . . .	<b>5</b>	
<b>6</b>	<b>Total 2017 tax year section 965(a) inclusion.</b> Add lines 4 and 5 . . . . . ▶	<b>6</b>	

**Part II Section 965(c) Deduction**

**SECTION 1—Section 965(c) Deduction by Tax Year**

		2018 Tax Year
<b>7</b> Enter the amount from Part I, line 1. If -0-, skip to line 16 . . . . .	<b>7</b>	
<b>8</b> <b>Aggregate Foreign Cash Position.</b> Enter the sum from Schedule D, line 21 . . . . .	<b>8</b>	
<b>9</b> Enter the smaller of line 7 or 8 . . . . .	<b>9</b>	
<b>10</b> <b>Enter the 2018 15.5% Rate Equivalent Percentage from Part II, Section 2.</b> Enter amount from Section 2, line 1a . . . . .	<b>10</b>	
<b>11</b> <b>Section 965(c) Deduction Related to 15.5% Rate Equivalent Percentage.</b> Multiply line 9 by line 10 . . . . .	<b>11</b>	
<b>12</b> Subtract line 9 from line 7 . . . . .	<b>12</b>	
<b>13</b> <b>Enter the 2018 8% Rate Equivalent Percentage from Part II, Section 2.</b> Enter amount from Section 2, line 1b . . . . .	<b>13</b>	
<b>14</b> <b>Section 965(c) Deduction Related to 8% Rate Equivalent Percentage.</b> Multiply line 12 by line 13 . . . . .	<b>14</b>	
<b>15</b> <b>2018 tax year section 965(c) deduction not from pass-throughs.</b> Add lines 11 and 14 . . . . .	<b>15</b>	
<b>16</b> <b>2018 tax year section 965(c) deduction from pass-throughs.</b> Attach schedule . . . . .	<b>16</b>	
<b>17</b> <b>Total 2018 tax year section 965(c) deduction.</b> Add lines 15 and 16. 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 . . . . .	<b>17</b>	

**For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.**