

**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 9011 is entered on line a, enter the country code for the sanctioned country

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)	(f) Reclassified section 965(a) PTEP	(g) 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)							

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.