

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

▶ Go to [www.irs.gov/Form965](http://www.irs.gov/Form965) for instructions and the latest information.

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

## 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
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## 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):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_