PASSIVE FOREIGN INVESTMENT COMPANY (PFIC) ORGANIZER (IRS FORM 8621)

(FOR INTERNAL USE ONLY BY ABITOS, CPAS AND ADVISORS, FORMERLY KNOWN AS THE BRUNTON STRACHAN & KHAN CPA FIRM)

| FOR TAX RETURN YEAR ENDED | CUR | RENT DATE | |
|---------------------------|-----|-----------|--|
| | | | |

(Each spouse complete a separate organizer)

TO AVOID DELAY WITH YOUR RETURN PLEASE ANSWER ALL QUESTIONS AND PROVIDE COPIES OF NECESSARY DOCUMENTATION

Certain non-U.S. mutual funds, exchange traded funds (ETFs), income trusts, (including those that operate a business or that own rental real estate) and Canadian or other <u>non-U.S. private holding companies</u> may be treated as PFICs, depending upon the nature of their assets and operations. PFICs generally are taxed <u>very adversely</u> in the US. Exceptions may apply if they are owned in a pension plan.

Under U.S. rules the sale of an interest in a "passive foreign investment company" (PFIC) for a profit, or receipt of excessive dividends, can potentially result in the profit, or dividends, being taxed at the <u>maximum</u> "ordinary" (graduated) income tax rates instead of the generally preferable long-term capital gains tax rates. Furthermore, there can be a "throwback" of tax to prior years and an interest charge for unpaid prior tax. Please contact us if you have questions and/or would like us to review your various investments to determine if you are required to file IRS Form 8621, are otherwise subject to the PFIC provisions, or if a "mark to market" or "qualified electing fund" election would be available or advantageous to you. In certain cases where a U.S. income tax return is not required to be filed, Form 8621, the annual information return with respect to PFICs may still be required to be filed.

| 1. | NameI | Phones: | Office | Home (U | S) | | |
|----|---|---|--------------|--------------------------|---------------------|--|--|
| 2. | Address | Н | ome (Non-US) | Cell | | | |
| | | F | ax | Email | | | |
| 3. | U.S. Taxpayer Identification Number (ITIN) or Soc | nber (ITIN) or Social Security Number | | Birth date _ | Birth date | | |
| 4. | | rms 8621 filed with the IRS in the prior year (unless prepared by us)? rovide copies of all Forms 8621 filed, if not included with your tax return. | | | Yes / No | | |
| 5. | Please provide the following information for <u>each</u> PFIC owned. Please note, <u>each fund</u> held within a mutual fund account is considered a <u>separate</u> PFIC and must be reported on a <u>separate</u> IRS Form 8621. If you need additional space, please attach additional copies of this organizer or include the required information on a separate sheet: | | | | | | |
| | (a) PFIC Name | | | | | | |
| | (b) Address | | | | | | |
| | (c) Description | | | | | | |
| | (d) Units acquired during current year, if any | | | | | | |
| | (e) Date(s) units acquired during current year | | | | | | |
| | (f) Units <u>held</u> at the end of the <u>current</u> year | | | | | | |
| | (g) Value of units held at the end of the current year | | | | | | |
| | (h) Also, please provide a complete history of all units purchased and sold as well as the price(s) for each transaction since the | | | | | | |
| | fund's inception. This is necessary in order to determine the current year basis of units held in the fund at the end of the year. | | | | | | |
| | (i) Distributions made by the fund in: (not necessary if a Mark-To-Market election has been made in a prior year. Please inform) | | | | | | |
| | - Current tax year | | | | | | |
| | - 1 st prior tax year | | | | | | |
| | - 2 nd prior tax year | | | | | | |
| | - 3 rd prior tax year | | | | | | |
| | (j) In what currency (i.e. U.S. dollars, Cdn dollars, Euros, etc.) is the above information presented? | | | | | | |
| | you have not answered all questions & supplied all documents delayed and/or the fee may be increased due to the extra | | | lease explain, otherwise | your tax return may | | |
| | Signed: | | | | | | |

PLEASE RETURN TO: ABITOS, CPAs AND ADVISORS, FORMERLY KNOWN AS THE BRUNTON, STRACHAN & KHAN CPA FIRM 327 PLAZA REAL, STE 235, BOCA RATON, FL 33432

Tel: (561) 241-9991 Fax: (561) 826-9299 Email: <u>tax@taxintl.cpa</u> Website: <u>www.taxintl.cpa</u>

Please include a US \$500 retainer payable to "AbitOs, PLLC" for each PFIC you own.

If you wish, retainers can be paid online with a credit card or eCheck. Please go to our website www.taxintl.cpa and scroll down to "Make Payment" on the lower right side or call our office to make a credit card payment over the phone.