

FORM 5471 ORGANIZER (FOR NON-U.S. CORPORATIONS)

(FOR INTERNAL USE ONLY BY ABITOS ADVISORS, LLC)

TAX YEAR-END OF SHAREHOLDER(S) _____ CURRENT DATE _____

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

BEWARE: A PENALTY OF \$10,000 MAY APPLY FOR EACH FAILURE TO TIMELY FILE FORM 5471

1. Name of corporation _____ U.S. Tax ID Number, if any _____
 2. Address _____
 3. Country and date of incorporation _____
 4. Please describe the nature of the entity's business activity _____
 5. Place of business and principal business activity of the corporation _____
 6. Name of the currency in which the activities are actually conducted (functional currency) _____
 7. Tax year-end of the corporation _____
 8. Name and address of the corporation's registered agent in the country of incorporation _____
9. Please provide the following:
- a. The financial statements in the foreign corporation's functional currency for the tax year ending within the calendar year (or corporate parent's year, if applicable) and balance sheet for the prior year.
 - b. A copy of the home country's income tax return.
 - c. The U.S. income tax return, if any, for the corporation's tax year ending within the calendar year.
 - d. The details (including date and amount) of any transfers of cash or property to the corporation by a U.S. person.
 - e. The details (including date and amount) of any distributions of cash or property from the corporation to a U.S. person.
 - f. The details of any related party* (including related entities) transactions – e.g. loans from/due to, salaries, dividends, sales of product or services, purchases of products or services, fees, transfers of property, etc.
 - i. *For this purpose, a related party is the U.S. person filing this return, any domestic or foreign corporation or partnership controlled by the U.S. person filing this return, any 10% or more U.S. shareholder of this controlled foreign corporation, or any 10% or more U.S. shareholder of any U.S. corporation controlling this foreign corporation.
 - ii. The maximum balance owed to/from a related party (including related entities) during the year.
10. A complete description of the exact share structure (**please provide a complete organizational chart**) – authorized and issued, par value, showing the voting rights and value of each and a list of the owners of each class of issued shares showing:
- a. Number of each type of shares owned (e.g. 500 common, no par value; 50 Class A preferred, no voting power; etc.)
 - b. Date of acquisition of each share,
 - c. Consideration paid for each share, **and**
 - d. Name, address, U.S. tax ID, citizenship, residency, U.S. green card status, family relationship (if any) of each shareholder of the foreign corporation.
 - e. For each Director and/or Officer who is a "U.S. person" (i.e. U.S. citizen, U.S. green card holder, U.S. resident), please provide us with the Name, address, **and** U.S. social security number.
11. Was the corporation subject to the Section 965 **Transition Tax** ("repatriation tax") during 2017 or 2018? If so, please provide a copy of the IRS Form 5471 for the transition tax year (unless prepared by us).

Among other circumstances, a minimum penalty of \$10,000 or 10% of the cash or property transferred may apply if the information above is not accurately and timely disclosed.

If you have not answered all questions & supplied all documents requested on this organizer, please explain, otherwise your tax return may be delayed and/or the fee may be increased due to the extra time required.

Signed: _____

PLEASE RETURN TO:

ABITOS ADVISORS, LLC
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Tel: (561) 241-9991

Fax: (561) 826-9299

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