



## Paperwork Reduction Act Notice

We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us this information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated average time is:

<b>Recordkeeping</b> . . . . .	2 hrs., 52 min.
<b>Learning about the law or the form</b> . . . . .	24 min.
<b>Preparing and sending the form to IRS</b> . . . . .	28 min.

If you have comments concerning the accuracy of this time estimate or suggestions for making the form more simple, we would be happy to hear from you. You can write to both the **Internal Revenue Service**, Washington, DC 20224, Attention: IRS Reports Clearance Officer, T:FP, and the **Office of Management and Budget**, Paperwork Reduction Project (1545-1189), Washington, DC 20503. **DO NOT** send the tax form to either of these offices. Instead, see the instructions below for information on where to file.

## General Instructions

*(Section references are to the Internal Revenue Code unless otherwise noted.)*

### Purpose of Form

Form 8819 is filed by a U.S. qualified business unit (QBU) –as defined in section 989(a)– or by or on behalf of a foreign QBU. The form is used to elect the U.S. dollar as the functional currency of an eligible QBU, as defined in Regulations section 1.985-2(b)(1).

### Who Must File

If the election is made by a U.S. person on behalf of a foreign branch of that person, Form 8819 must be filed by the U.S. person.

If the election is made on behalf of a controlled foreign corporation (CFC) or a branch of a CFC, Form 8819 must be filed by the CFC’s controlling U.S. shareholders as defined in Regulations section 1.985-2(c)(2).

If the election is made on behalf of a noncontrolled foreign corporation or branch of a noncontrolled foreign corporation, Form 8819 must be filed by each of the foreign corporation’s majority U.S. shareholders as defined in Regulations section 1.985-2(c)(3).

If an election is made by a foreign corporation, Form 8819 must be filed by an authorized officer or director of the foreign corporation.

If an election is made by a partnership, trust, or estate, Form 8819 must be filed as follows:

In the case of a partnership, the election must be made by the partnership. See section 703(b). In the case of a trust, the election must be made by the trustee. In the case of an estate, the election must be made by the executor or executrix.

**Signature.**—If there is not enough space for all required filers to sign Form 8819, attach a sheet showing each additional signature, that person’s title, if any, and the date signed. The sheet must be signed under penalties of perjury.

## When and Where To File

A U.S. person electing on behalf of a foreign branch must file Form 8819 with that U.S. person’s timely filed Federal income tax return (including extensions) for the tax year the election is made.

If the election has been made in a previous tax year under the provisions of Regulations section 1.985-2, file Form 8819 within 300 days after the end of the first tax year beginning in 1991. File Form 8819 with the Internal Revenue Service Center, Philadelphia, PA 19255.

All others must file Form 8819 within 180 days after the end of the tax year for which the dollar election is made. File Form 8819 with the Internal Revenue Service Center, Philadelphia, PA 19255.

## Specific Instructions

**Address.**—Include the suite, room, or other unit number after the street address. If the Post Office does not deliver mail to the street address and the filer has a P.O. box, enter the P.O. box number instead of the street address.

**Line 6.**—Enter on line 6 the name of the country where the principal place of business of the QBU is located and country of each of its eligible QBU branches.

**Line 7.**—If line 2 is checked, enter on line 7 the name, address, and identifying number of each U.S. partner or beneficiary.

If line 3 or 4 is checked, enter on line 7 the name, address, identifying number of, and the percent of stock owned (within the meaning of section 958(a)) in each class of stock for each U.S. shareholder (as defined in section 951(b)) making the election.

If line 5 is checked by a controlled foreign corporation (CFC), enter on line 7 the name, address, identifying number of, and percent of stock owned in each class of stock for each U.S. shareholder (as defined in section 951(b)) who is known by the foreign corporation to own stock in the foreign corporation. See section 958(a) for a definition of stock ownership.

If line 5 is checked by a noncontrolled foreign corporation, enter on line 7 the name, address, identifying number, and percent of stock owned (as defined in section 902(b)) in each class of stock for each domestic corporate shareholder.