U.S. Income Tax Return of a Foreign Corporation

OMB No. 1545-0126

	m I I Z artment of the rnal Revenue S	Treasury	For calendar year	1997, or tax year beginning ► See separate				, 19	19	97
_		sei vice		> See separate	ilistiu	Ctions.		Employer id	I lentification r	number
r print										
oe or	Number,	street, and	room or suite no. (see	e page 6 of instructions)				Check appl	icable boxes:	
e tr	5								turn 🗌 Ame	
Please type	City or to	own, state a	nd ZIP code, or count	ry (see page 6 of instructions)				Final ret	urn 🗌 Cha	inge of address
Α	Country of	incorpora	tion			Check method of		•		Accrual
В				income reported on this return	- 1	(3) Other (sp. Did the corporat				Yes No
С					''	for the preceding				
D	Location o	f corporati	on's primary books	and records:	1	At any time during	the tax	year, was the o	corporation	
	City, state and country					engaged in a trade	e or busir	ness in the Unit	ed States?	
					J	At any time during t permanent establishr	he tax yea	r, did the corpor	ation have a	
	Principal location of business					applying section 894 the United States an	(b) and any	applicable tax tre	eaty between	
Ε	If the corp the tax yea		d an agent in the U	nited States at any time during		If "Yes," enter th				
	-				Ιĸ	Is the corporati	on a fo	reian person	al holding	
	Name					company? (See s				
					If "Yes," have you filed Form 5471? (Sec. 6035). See page 3 of the instructions					
F	Refer to the principal:	e list on pa	ge 18 of the instruct	ions and state the corporation's	L	Did the corporatelated parties?		e any transac		
		ss activity	code number ▶			If "Yes," you may h				
						and section 6038C)				
	(3) Produc	t or service	e ►		l	Enter number of				0 15
_				Computation of Tax D	•	e: Additional infor		required at the	bottom or p	ages 2 and 5
1	Tax fror	n Section	I, line 11, page 2					1		
2				9, page 4						
3				10 on page 5)						
4	Persona	ıl holding d	company tax (attacl	n Schedule PH (Form 1120))—s	see pag	je 6 of instruction	s	4		
5	Total ta	x. Add line	es 1 through 4 .					5		
6	Paymer			(0						
í			t credited to 1997	6a 6b						
k (x payments lied for on Form 4466) Bal▶	6d				
•			h Form 7004		Dai •	6e				
1				aptial gains (attach Form 2439))	6f				
Ç		•		Form 4136). See instructions		6g				
ŀ	u.S. inc	ome tax pa	aid or withheld at so	urce (add line 12, page 2, and ar	mounts					
	from Fo	rms 8288-	A and 8805 (attach	Forms 8288-A and 8805))		6h				
i		-	dd lines 6d through					6i		
7				instructions). Check if Form 22			•	· 🗆 7		
8				total of lines 5 and 7, enter am				8		
9 10		•	U	the total of lines 5 and 7, ente			 Refunde	—		
_		Under per	nalties of perjury, I decl	are that I have examined this return, i	including	accompanying sch	edules and	I statements, and	d to the best of	f my knowledge
	ease	and belief	, it is true, correct, and	complete. Declaration of preparer (o	ther tha	n taxpayer) is based	on all info	rmation of which	preparer has	any knowledge.
	gn									
H(ere	Signatu	ure of officer		D	ate	Title	e		
Pa		Preparer' signature			D	ate	Check employ	if self- 🖂	eparer's social	security number
	eparer's	Firm's na					' ' '	IN ►	1	•
Use Only		yours if s and addr	elf-employed) ——ess				Z	IP code ►		

Cat. No. 11470I

Form 1120-F (1997) Page **2**

SECTION I.—Certain Gains, Profits, and Income From U.S. Sources That Are NOT Effectively Connected With the Conduct of a Trade or Business in the United States (See page 6 of instructions.)

If you are required to complete Section II or are using Form 1120-F as a claim for refund of tax withheld at source, include below **ALL** income from U.S. sources that is **NOT** effectively connected with the conduct of a trade or business in the United States. Otherwise, include only those items of income on which the U.S. income tax was not fully paid at the source. The rate of tax on each item of **gross** income listed below is 30% (4% for the gross transportation tax) or such lower rate specified by tax treaty. No deductions are allowed against these types of income. Fill in treaty rates where applicable. **If the corporation claimed a lower treaty rate, also complete Item W, page 5**.

Na	me of treaty country, if any ▶									
	(a) Nature of income	Gro	(b) oss income	e		(c) Rate of tax (%)	(d) Amount of tax	Amount of U paid or withhe		
1	Interest									
2	Dividends									
3	Rents				+					
4	Royalties				+					
5	Annuities									
	Gains from disposal of timber, coal, or domestic iron ore with a retained economic interest (attach supporting schedule)									
7	Gains from sale or exchange of patents, copyrights, etc									
8	Fiduciary distributions (attach supporting schedule)									
9	Gross transportation income (see page 7 of instructions).					4				
10	Other fixed or determinable annual or periodic gains, profits, and income									
11	Total. Enter here and on line 1, page 1					•				
12	Total. Enter here and include on line 6h	, page 1								
	ditional Information Required (cont									
	Is the corporation a personal holding company section 542 for definition.).		Yes N	No :	S	Enter the availabl	e NOL carryover from prio it by any deduction o	or tax years. n line 30a.	Yes	No
N	Is the corporation a controlled foreign corpo (See section 957 for definition.)					page 3.) ► \$	n a subsidiary in a parent			
0	Is the corporation a personal service corporatio page 7 of instructions for definition.)					controlled group	?			
Р	Enter tax-exempt interest received or accrued the tax year (see instructions) ▶ \$	during				number of the pa	arent corporation ▶			
	At the end of the tax year, did the corporation directly or indirectly, 50% or more of the voting of a U.S. corporation? (See section 267(c) for attribution.)	n own, g stock rules of				partnership, corp or indirectly, 50%	the tax year, did any poration, estate, or trust of or more of the corporation 267(c) for attribution	wn, directly ion's voting		
	If "Yes," attach a schedule showing (1) nar identifying number of such U.S. corporation; (2) per owned; and (3) taxable income or (loss) before N special deductions of such U.S. corporation for the ending with or within your tax year.	centage OL and				identifying numb already entered i	a schedule showing the er. (Do not include any in T above).	information		
	If the corporation has a net operating loss (Not the tax year and is electing to forego the carriperiod, check here			ı			ormation is required at th		page 5.	

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SECTION II.—Income Effectively Connected With the Conduct of a Trade or Business in the United States (See page 7 of instructions.) IMPORTANT—Fill in all applicable lines and schedules. If you need more space, see Attachments on page 3 of instructions. 1a Gross receipts or sales ______ b Less returns and allowances ______ c Bal ▶ 3 **3** Gross profit (subtract line 2 from line 1c) 4 5 6 6 7 7 8 Capital gain net income (attach Schedule D (Form 1120)) 9 Net gain or (loss) from Form 4797, Part II, line 18 (attach Form 4797) 10 10 Total income. Add lines 3 through 10 11 11 12 12 Compensation of officers (Schedule E, line 4). Deduct only amounts connected with a U.S. business (See instructions for limitations on deductions.) 13 13 14 14 15 16 16 17 17 18 18 Interest allowable under Regulations section 1.882-5 (see page 10 of instructions—attach schedule). 19 Charitable contributions (see page 10 of instructions for 10% limitation) 19 Less depreciation claimed on Schedule A and elsewhere on return 21 21 22 22 23 23 24 25 27 Other deductions (see page 11 of instructions—attach schedule) **Deductions** 28 29 29 Taxable income before NOL deduction and special deductions (subtract line 28 from line 11) . 30 Less: a Net operating loss deduction (see page 12 of instructions) | 30a | **b** Special deductions (Schedule C, line 15). 30b 30c 31 Schedule A Cost of Goods Sold (See page 12 of instructions.) 1 2 3 4 Additional section 263A costs (see instructions—attach schedule) 5 6 7 Cost of goods sold. Subtract line 7 from line 6. Enter here and on Section II, line 2. . . . 9a Check all methods used for valuing closing inventory: (1) \square Cost as described in Regulations section 1.471-3 (2) Lower of cost or market as described in Regulations section 1.471-4 (3) ☐ Other (Specify method used and attach explanation.) ▶ b Check if there was a writedown of subnormal goods as described in Regulations section 1.471-2(c) If checked, attach Form 970. d If the LIFO inventory method was used for this tax year, enter percentage (or amounts) of closing

If "Yes," attach explanation.

f Was there any change in determining quantities, cost, or valuations between opening and closing inventory?

Yes No

☐ No

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Sc	hedule C Dividends and Speci	al Deductions (See	instructions.)	(a) Divider		o) %	(c) Special deductions:	_
	Dividends from less-than-20%-owned		received	1 .		(a) × (b)		
	subject to the 70% deduction (other that	·			70			
		ridends from 20%-or-more-owned domestic corporations that are				80		
	•	bject to the 80% deduction (other than debt-financed stock)				see uctions		
	Dividends on certain preferred stock of les					42		
5	Dividends on certain preferred stock of 2	0%-or-more-owned pul	blic utilities _			48		
	Dividends from less-than-20%-owned	foreign corporations	that are					
	,					70		
	Dividends from 20%-or-more-owned for to the 80% deduction	eign corporations that a	are subject			80		
8	Total. Add lines 1 through 7. See page	13 of instructions for I	imitation .					
	Other dividends from foreign corporations		3, 6, and 7					
	Foreign dividend gross-up (section 78)							
	C-DISC and former DISC dividends not include	led on lines 1, 2, or 3 (sec	tion 246(d))					
	Other dividends Deduction for dividends paid on certain	nreferred stock of a nu	 ublic utility					Π
	Total dividends. Add lines 1 through 12.							
	Total deductions. Add lines 8 and 13. Er				40			
Sc	hedule E Compensation of Off Section II) are \$500,00	icers (Complete Sch	nedule E only	if total recei	ipts (line 1a	plus	lines 4 through 10 (Эf
	Section ii) are \$500,00		(c) Percent of	Percent of	corporation	Jaye		
	(a) Name of officer	(b) Social security number	time devoted to business	(d) Common	wned (e) Preferred	-	(f) Amount of compensation	
1			%	%	%			
			%	%	%			
			%	%	%			
			%	%	<u>%</u>			
			% %	% %	<u>%</u> %			
			%	%	<u> </u>			-
2	Total compensation of officers							
3	Compensation of officers claimed o							
4	Subtract line 3 from line 2. Enter the hedule J Tax Computation (S							
ას 1	Check if the corporation is a membe			·	62)			
'	Important: Members of a controlled				03) 🕨 🗀			
2a	If the box on line 1 is checked, en				,000, and			
	\$9,925,000 taxable income bracket	•	•					
	(1) \(\bigs\) (2)	\$	(3) 🖺					
b	Enter the corporation's share of:	n \$11.750) \$		1 1				
	(1) Additional 5% tax (not more tha(2) Additional 3% tax (not more tha							
3	Income tax. Check this box if the co	+	ed personal se	ervice corpor	ation (see			
-						3		
4a	Foreign tax credit (attach Form 111)	8)						
b			41	h				
_	QEV credit (attach Forr General business credit. Enter here and	•						
C	□ 3800 □ 3468 □ 5884		6765					
	□ 8586 □ 8830 □ 882¢		8844					
	☐ 8845 ☐ 8846 ☐ 8820		8861					
d	, , , , , , , , , , , , , , , , , , , ,		40					
5	Total credits. Add lines 4a through					<u>5</u> 6		_
6 7	Subtract line 5 from line 3 Recapture taxes. Check if from:					7		
8	Alternative minimum tax (attach For					8		_
9	Total tax under section 882(a). Ad					9		

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	SECTION III.—Branch Profits Tax and Tax on Excess Interest (See page 15 of the instructions.)								
Pai	t I—Branch Profits Tax								
1	Enter the amount from Section II, line 29	1							
2	Enter total adjustments made to get effectively connected earnings and profits. (Attach a								
	schedule showing the nature and amount of adjustments.) (See instructions.)	2							
3	Effectively connected earnings and profits. Combine line 1 and line 2. Enter the result here	3							
4a	7	4a 4b							
b		40							
C	Increase in U.S. net equity. If line 4a is greater than or equal to line 4b, subtract line 4b from line 4a. Enter the result here and skip to line 4e	4c							
	Decrease in U.S. net equity. If line 4b is greater than line 4a, subtract line 4a from line 4b. Enter the result here	4d							
e	Non-previously taxed accumulated effectively connected earnings and profits. Enter excess, if any, of effectively connected earnings and profits for preceding tax years beginning after 1986 over any dividend equivalent amounts for those tax years	4e							
5	Dividend equivalent amount. Subtract line 4c from line 3. Enter the result here. If zero or less, enter -0 If no amount is entered on line 4c, add the lesser of line 4d or line 4e to line 3 and enter the total here	5							
6	Branch profits tax. Multiply line 5 by 30% (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). Enter here and include on line 3, page 1. (See instructions.) Also complete Items W and X below	6							
Pai	t II—Tax on Excess Interest								
7a	Enter the interest from Section II, line 18	7a							
b	Enter the interest apportioned to the effectively connected income of the foreign corporation that is capitalized or otherwise nondeductible	7b							
c	Add lines 7a and 7b	7c							
8	Enter the branch interest (including capitalized and other nondeductible interest). (See instructions for definition.) If the interest paid by the foreign corporation's U.S. trade or business was increased because 80% or more of the foreign corporation's assets are U.S. assets, check this box	8 9a							
	Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0	7a							
	Off the foreign corporation is a bank, enter the excess interest treated as interest on deposits. Otherwise, enter -0 (See page 16 of instructions.)	9b 9c							
10	Tax on excess interest. Multiply line 9c by 30% or lower treaty rate (if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See page 16 of instructions.) Enter here and include on line 3, page 1. Also complete Items W and X below.	10							
Add	litional Information Required (continued from page 2)								
	Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to: (1) A complete termination of all U.S. trades or businesses?	or mo Unite tax?	odifies an d States	Yes	No				
	(2) The tax-free liquidation or reorganization of a foreign corporation?	ty-bas	ed return						
	(3) The tax-free incorporation of a U.S. trade or business?	ce for	purposes						
	domestic, attach Form 8848. interest tax, check the basis for								
				. 🗆					

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6	Additional schedules to be co	· ·					18.)
Sc	hedule L Balance Sheets per Books	Beginning	of tax			tax year	
	ASSETS	(a)		(b)	(c)		(d)
1	Cash						
2a	Trade notes and accounts receivable						
b	Less allowance for bad debts	()			()		
3	Inventories						
4	U.S. government obligations						
5	Tax-exempt securities (see instructions)						
6	Other current assets (attach schedule)						
7	Loans to stockholders						
8	Mortgage and real estate loans						
9	Other investments (attach schedule).						
10a	Buildings and other fixed depreciable assets						
	Less accumulated depreciation	()			()		
	Depletable assets						
	Less accumulated depletion	()			()		
	Land (net of any amortization)						
	Intangible assets (amortizable only)						
	Less accumulated amortization	()			()		
	Other assets (attach schedule)						
	Total assets						
	BILITIES AND STOCKHOLDERS' EQUITY						
	Accounts payable						
	Mtges., notes, bonds payable in less than 1 year						
18	,						
	Loans from stockholders						
20	Mtges., notes, bonds payable in 1 year or more						
21	Other liabilities (attach schedule)						
22	•						
	b Common stock					_	
23	·					-	
24	Retained earnings—Appropriated (attach schedule)						
25	Retained earnings—Unappropriated .						
26	Adjustments to shareholders' equity						
	(attach schedule)		,				
	Less cost of treasury stock		())
_	Total liabilities and stockholders' equity		<u> </u>			1	
	: The corporation is not required to complete Sci					า (d) are les	ss than \$25,000.
	hedule M-1 Reconciliation of Inc	come (Loss) per B	OOK	s With Income	per Return		
1	Net income (loss) per books		7	Income recorded	d on books this year		
2	Federal income tax				this return (itemize):		
3	Excess of capital losses over capital gains		a	Tax-exempt inte	erest, \$		
4	Income subject to tax not recorded on						
	books this year (itemize):		8	Deductions on th	is return not charged		
					me this year (itemize):		
5	Expenses recorded on books this year		a		\$		
	not deducted on this return (itemize):		b	Contributions carr	yover \$		
а	Depreciation \$				-		
	Contributions carryover \$		9		8		
	Travel and entertainment \$		10		page 3)—line 6 less		
	Add lines 1 through 5			line 9			
	hedule M-2 Analysis of Unappro	opriated Retained	Ear	nings per Boo	ks (Schedule L, lin	ie 25)	
	Balance at beginning of year				Cash		
	Net income (loss) per books				Stock		
3	Other increases (itemize):		1		Property		
J			6		s (itemize):		
			7		ough 6		
4	Add lines 1, 2, and 3		8		vear (line 4 less line 7)		