Form 3520

Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts

Department of the Treasury Internal Revenue Service

Instructions are separate.

OMB No. 1545-0159

2000

All information must be in English. S	how all amounts in U.S.	dollars. File a separate Fo	orm 3520 for each fo	oreign trust.	
For calendar year 2000, or tax year beginning		, 2000 , ending		, 20	
A Check appropriate box(es): See Instructi	ons. 🔲 Initial return	☐ Final return	☐ Am	ended return	
B Check box that applies to U.S. person fi	lling return: Individual	Partnership Corpo	oration Trust	Executor	
Check all applicable boxes: (a) You are a U.S. transferor who, direction (b) You held an outstanding obligation of treated as a "qualified obligation" (definition of the control of the	of a related foreign trust (or a ed on page 3 of the instruction	person related to the trust) is: ons) during the current tax yea	sued during the current ar. See the instructions for	tax year, that you or Part I.	
 (a) You are a U.S. person who, during to outstanding obligation issued by you (or (defined on page 3 of the instructions) of You are a U.S. person who, during the Part IV. Service Center where U.S. person filing this 	he current tax year, received r a person related to you) dur during the current tax year. So current tax year, received cer	a distribution from a foreign tr ing the current tax year that yee ee the instructions for Part III. tain gifts or bequests from a f	rust, or (b) A related fore ou treated as a "qualified	eign trust held an d obligation"	
1a Name of U.S. person(s) filing return	Teturi illes its ilicome tax re	turr 🖊	b Identification num	nber	
c Number, street, and room or suite no	. (If a P.O. box, see instruction	ons.)	d Spouse's identification	on number (see instr.)	
e City or town	f State or province	g ZIP or postal code	h Country		
2a Name of foreign trust (if applicable)	b Identification number (if	any)	c Number, street, an	nd room or suite no.	
d City or town	e State or province	f ZIP or postal code	g Country		
3 For purposes of section 6048(b), did t who can provide the IRS with all relev If "Yes," complete lines 3a through 3g	ant trust information?	S. agent (defined on page 4 of		∕es □ No	
3a Name of U.S. agent	b Identification number (if	any)	c Number, street, an	nd room or suite no.	
d City or town	e State or province	f ZIP or postal code	g Country		
4a Name of U.S. decedent (see instr.)	b Address	·	c TIN of decedent		
d Date of death	e EIN of estate				
Part I Transfers by U.S. Perso	ons to a Foreign Trust	During the Current Tax	· ·		
5a Name of trust creator (if different from line 1a) b Address			c Identification num	ber (if any)	
6a Country code of country where trust was c	c Date trust was created				
7a Will any other person be treated as th	ne owner of the transferred as	ssets after the transfer?	🗆 ү	′es 🗌 No	
b Name of other foreign trust owners, if any (a)	Address (b)	Country of residence (c)	Identification number, if any (d)	Relevant code section (e)	
Under penalties of perjury, I declare that I have knowledge and belief, it is true, correct, and comp		g any accompanying reports, sch	nedules, or statements, an	d to the best of my	
Signature	Title		Date		
Preparer's signature	Prepare	r's SSN or PTIN			

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Pai	t I	(Continu	ued)								
8 9a b 10	Now o	or in the futu " could the	re, can any part o trust be revised on to be treated as th	f the income or co amended to ben ne owner of the tra	," see instructions orpus of the trust be lefit a U.S. beneficiansferred asset(s) a of a Related T	penefit any U.S. b ary? after the transfer?	eneficiary? .		es No		
11-	D. union a	. 41		•		·					
	During the current tax year, did you transfer property (including cash) to a related foreign trust in exchange for an obligation of the trust or a person related to the trust? See instructions										
b	If "Yes	s," complete	Schedule A with	respect to that ob	? oligation. If "No," go dess it is a qualified	o to Schedule B.		L Y	es 🗌 No		
	Date of transfer giving rise to obligation (a)		Max	ximum term (b)		maturity c)	FMV of obligation (d)				
12	2 With respect to each obligation you treated as a "qualified obligation" on line 11b: Do you agree to extend the period of assessment of any income or transfer tax attributable to the transfer and any consequential income tax changes for each year that the obligation is outstanding, to a date 3 years after the maturity date of the obligation? Yes No Note: Generally, you must answer "Yes," if you checked "Yes" to question 11b.										
			Schedu	le B—Gratuito	ous Transfers	(See instructio	ns on page	6.)			
13	FMV, o	or no consid	leration at all, for t columns (a) throu	he property trans	ers (directly or indi ferred? he rest of Schedul				es 🗌 No		
tra	Date of transfer (a) Description of property transferred (b) FMV of property transferred (c)		U.S. adj. basis of property transferred (d)	of property at time of transferred transfer		Excess, if any, of column (c) over the sum of columns (d) and (e) (f) Excess, if any, of property received, if any (g)		Excess of column (c) over column (h) (i)			
Tota	ls ▶					\$			\$		
10ta 14		ro roquirod	to attach a convi	of each sale or la	an document ente	•	ction with a tra	anefor roported a			
14					within the previous				n line 13. li these		
a b	Sale d	you attached locument?. document?	d a copy of:				Yes N	Attached			
c					ents?						

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Form 3520 (2000) Page 3 Part I (Continued) Note: Complete lines 15 through 18 only if you answered "No" to line 3. U.S. beneficiary? 15 Name of beneficiary Identification number, if any Address of beneficiary (b) Yes Name of trustee Identification number, if any 16 Address of trustee (a) (b) Name of other persons Description of Address of other persons with trust powers Identification number, if any 17 powers (c) with trust powers (d)

below. If these documents have been attached to a Form 3520-A filed within the previous 3 years, attach only relevant updates.

Attached Year
Have you attached a copy of:

Summary of all written and oral agreements and understandings relating to the trust?...

If you checked "No" on line 3 (or did not complete lines 3a through 3g) you are required to attach a copy of all trust documents as indicated

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FOIII	1 3520 (2000)												Page 4
Pa	rt I Sched	ule C—(Qualified Obligat	ions Outs	standing i	n th	ne Current	Tax \	Year (See ins	structio	ons (on pa	age 6.)
19	related to the tri	ust) that ye	ng the tax year, hold ou treated as a "quali as (a) through (e) below	fied obligation							Yes		□ No
	Date of original obligation		obligation first	Tax year qualified obligation first reported		Amount of principal payments made during the tax year		Amount of interest payments made during the tax year			Does the obligation still meet the criteria for a qualified obligation? (e)		
	(a)		(b)			(c)			(d)		Υ	es	No
Pa	rt II U.S. O	wner of	f a Foreign Trust	(See instr	L ructions o	n na	age 6)						
Name of other foreign trust owners, if any (a)		eign		ldress (b)	ress		Country of residence (c)		ldentification number, if any (d)		Relevant code section (e)		section
21	Country code of country where foreign trust was created (a)				y code of cour	ountry whose law governs the foreign trust (b) Date foreign trust wa (c)					as created		
22			orm 3520-A for the cu								Yes		No
		-	gn Grantor Trust Own		•								
	for information of	-	ete and attach a subst	itute Form 3	520-A IOI LITE	HOLE	eign trust. See	page 4	4 OF ITISTRUCTIONS				
23		•	ne portion of the forei	gn trust that	you are trea	ated	as owning .			\$			
Pa			o a U.S. Person Fr							instruc	tions	on p	age 7.)
24	Cash amounts or	FMV of pr	operty received, directly	, , ,	· <u> </u>				oreign trust (excl	ude loan	s incl	uded c	n line 25).
Date of distribution Description (a)		Descript			FMV of property received (determined on date of distribution) (c)								umn (c) nn (e)
	-1-			. /////////////////////////////////////						//// 🌣			
1 Ota	als			• <i>\\\\\\\\\</i>	///////////////////////////////////////	/////	///////////////////////////////////////			//// \$			

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Form 3520 (2000) Page 5 Part III (Continued) During the current tax year, did you (or a person related to you) receive a loan from a related foreign trust (including ☐ No an extension of credit upon the purchase of property from the trust)? Yes If "Yes," complete columns (a) through (g) below with respect to such loans. Note: The FMV of an obligation (column (f)) is -0- unless it is a "qualified obligation." Maximum term of Is the obligation a Amount treated as distribution Interest rate Date of original "qualified obligation"? FMV of loans proceeds repayment of FMV of obligation from the trust (subtract loan transaction of obligation column (f) from column (a)) (a) obligation (e) (d) (b) (g) (c) No Total . 26 With respect to each obligation you treated as a "qualified obligation" on line 25: Do you agree to extend the period of assessment of any income or transfer tax attributable to the transaction, and any consequential income tax changes for each year that the obligation is outstanding, to a date 3 years after the maturity date of the ☐ Yes ☐ No Note: Generally, you must answer "Yes" if you checked "Yes" in column (e) of line 25. 27 Total distributions received during the current tax year. Add line 24, column (f), and line 25, column (g). Did the trust, at any time during the tax year, hold an outstanding obligation of yours (or a person related to you) 28 ☐ No If "Yes," complete columns (a) through (e) below with respect to each obligation. Does the loan still meet the Date of original loan Tax year Amount of actual principal Amount of actual criteria of a qualified transaction qualified obligation payments made during interest payments obligation? (a) first reported the tax year made during (e) (c) the tax year (d) Yes Nο Yes ☐ No Did you receive a Foreign Grantor Trust Beneficiary Statement from the foreign trust with respect to a distribution? 29 If "Yes," attach the statement and do not complete the remainder of Part III with respect to that distribution. If "No," complete Schedule A with respect to that distribution. □ No Did you receive a Foreign Nongrantor Trust Beneficiary Statement from the foreign trust with respect to a distribution? 30 If "Yes," attach the statement and complete either Schedule A or Schedule B below (see instructions). If "No," complete Schedule A with respect to that distribution. Schedule A—Default Calculation of Trust Distributions (See instructions on page 8.) Enter amount from line 27 . . . 31 32 Number of years the trust has been a nongrantor trust (see instructions). ▶ _ 33 Enter total distributions received from the foreign trust during the 3 preceding tax years (or the number of years 34 35 Average distribution. Divide line 34 by 3 (or the number of years the trust has been a nongrantor trust, if fewer 36 Amount treated as ordinary income earned in the current year. Enter the smaller of line 31 or line 35 Amount treated as accumulation distribution. Subtract line 36 from line 31. If -0- or less, enter -0- and do not 37 38 Compute applicable number of years of trust. Divide line 32 by 2 and enter here ▶ Schedule B—Actual Calculation of Trust Distributions (See instructions on page 8.) 39 40 Amount treated as accumulation distribution. If -0- or less, enter -0- and do not complete Schedule C, Part III . 41 42 Amount treated as capital gains in the current tax year 43 Enter any other distributed amount received from the foreign trust not included on lines 40, 41, 42, and 43 (attach explanation). 44 45

Compute applicable number of years of trust. Divide line 46 by line 45 and enter here ▶

46

47

		Schedule	e C—Calcul	lation of Interest Charge (See instructions on page	ge 9.)						
48	Enter accumulation	distribution from line	37 or 41, as	applicable							
49		accumulation distribut									
50	Enter applicable numl	er of years of foreign trust from line 38 or 47, as applicable (round to nearest half-year).									
51		, ,	e imposed on the total accumulation distribution. See Table B on page 9 of instructions .								
52		ultiply the amount on									
53	=	· -	-	nes 49 and 52. Enter here and as "additional tax" on ye							
	income tax return			<u> </u>							
Pa		pients of Gifts or B on page 9.)	equests Re	eceived During the Current Tax Year From Foreigr	າ Pers	ons (See instructions					
54	During the current bequests from a no	. [☐ Yes ☐ No								
	If "Yes," complete space is needed, a	, , , ,	c) with respec	ct to each such gift or bequest in excess of \$5,000. If m	ore						
	Date of gift or bequest (a)			Description of property received (b)	FMV of property received (c)						
	(u)										
					\longrightarrow						
					\longrightarrow						
Tota	-1				•	\$					
55	or a foreign partne	rship? See instruction	s regarding re	\$10,931 that you treated as gifts from a foreign corporat elated donors	. [☐ Yes ☐ No					
	Date of gift Name of donor (a) (b)		or	Address of donor (c)		Identification number, if any (d)					
					-+						
					\rightarrow						
Ch	neck the box that applie	•		Description of property received	FM	IV of property received					
	(e)			(f)	(g)						
	Corporation	Partnership			├─						
					├─						
					\vdash						
											
56	Do you have any re 55, was acting as a	eason to believe that t a nominee or intermed	ne toreign do liary for any d	nor, in making any gift or bequest described in lines 54 a other person? If "Yes," see instructions.	and . [☐ Yes ☐ No					

