## Form 8895 One-Time Dividends Received Deduction for Certain Cash <br> (August 2005) Dividends from Controlled Foreign Corporations <br> OMB No. 1545-1948 <br> Department of the Treasury <br> Internal Revenue Service <br> - Attach to the corporation's tax return. <br> Employer identification number <br> Part I Qualifying Information

A Enter the date(s) the corporation's domestic reinvestment plan(s) (DRP) was approved by the corporation's president, CEO, or comparable official $>$, 20 $\qquad$
B Enter the date(s) the DRP was approved by the corporation's board of directors, management committee, executive committee, or similar body $\qquad$ , 20 $\qquad$ _.
C The DRP states that the corporation anticipates completing all reinvestments in the tax year ending , 20 $\qquad$ . See Notice 2005-10 for required attachment.
D Does the corporation have an applicable financial statement (as defined in section 965(c)(1)) that shows a specific amount of earnings permanently reinvested outside the United States?

If "Yes," enter that amount on line 2 below. However, if the corporation is a member of a controlled group of corporations, see instructions.

If "No," complete item E below.
E If item D is "No," does the corporation have an applicable financial statement that shows a specific amount of tax liability attributable to earnings permanently reinvested outside the United States?
$\square$ Yes
$\square \mathrm{N}$
If "Yes," divide the tax liability by 0.35 and enter the result on line 2 below. However, if the corporation is a member of a controlled group of corporations, see instructions.

If "No," enter - 0 - on line 2 below.
F Is the corporation required to adjust the amount of its base period inclusions, APB 23 limitation, or related party indebtedness pursuant to Notice 2005-38?

## Part II Dividends Received Deduction

1 Enter the "cash dividends" that the corporation received from all controlled foreign corporations (CFCs) during the tax year. See instructions
2 Earnings permanently reinvested outside the United States (see items D and E above).
3 Section 965(b)(1) limit. Enter the greater of line 2 or $\$ 500,000,000$. However, if the corporation is a member of a controlled group of corporations, see instructions
4 Section 965(b)(2) base period amount. Enter amount from Part VI, line 51
5 Section 965(b)(2) limit. Subtract line 4 from line 1. If zero or less, stop here (see instructions).
6 Section 965(b)(4) limit. Amounts to be reinvested in the United States under a DRP
7 Enter the smallest of lines 3,5 , and 6.
8 Enter the amount of CFC indebtedness to any related person as of the close of the tax year (see instructions)
9 Enter the amount of CFC indebtedness to any related person as of the close of October 3, 2004 (see instructions)
10 Section 965(b)(3) limit. Subtract line 9 from line 8. If zero or less, enter -0-
11 Qualifying dividends. Subtract line 10 from line 7. If zero or less, stop here (see instructions). If more than zero, enter the result here and on Form 1120, Schedule C, line 12, column (a)
12 Enter all section 965(a)(2) amounts included on line 11 (see instructions) 12
13 Deductible portion of qualifying dividends. Multiply line 11 by 85\%. Enter here and on Form 1120, Schedule C, line 12, column (c)
14 Expenses disallowed under section 965(d)(2) with respect to line 13 amount $\quad 14$
15 Nondeductible CFC dividends. Subtract line 13 from line 11. See instructions

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## Part III Regular Tax Liability for Computing Credit Limitations and Alternative Minimum Tax

16 Enter the corporation's taxable income (Form 1120, line 30)
17 Taxable income excluding nondeductible CFC dividends. Subtract line 15 from line 16
18 Enter the corporation's regular tax liability (Form 1120, Schedule J, line 3)
19 Tax on nondeductible CFC dividends. Enter the smaller of line 18 or $35 \%$ of line 15
20 Tax on line 17 amount. Subtract line 19 from line 18
21 Foreign tax credit that reduces tax on line 19 (see instructions)
22 Subtract line 21 from line 19
23 Foreign tax credit that reduces tax on line 20. Subtract line 21 from line 39
24 Subtract line 23 from line 20
25 Alternative minimum tax (see instructions)
For Paperwork Reduction Act Notice, see instructions.
Cat. No. 37703U

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| Form 8895 |  | $(8-2005)$ |

## Part IV Foreign Tax Credit—Additional Limitation for Separate Categories With Nondeductible CFC Dividends (see instructions)

26 Enter the name of the separate category
27 Enter the amount of nondeductible CFC dividends in the separate category
28 Subtract line 27 from the amount on Form 1118, Schedule B, Part II, line 6
29 Subtract line 27 from the amount on Form 1118, Schedule B, Part II, line 7c
30 Divide line 28 by line 29
31 Enter $35 \%$ of line 27
32 Subtract line 31 from the amount on Form 1118, Schedule B, Part II, line 9
33 Multiply line 30 by line 32
34 Enter foreign taxes paid or accrued with respect to line 27 amount
35 Add lines 33 and 34 .
36 Enter the credit computed for the separate category on Form 1118, Schedule B, Part III .
37 Enter the smaller of line 35 or line 36
38 Enter the smaller of line 31 or line 34
39 Enter the corporation's revised foreign tax credit for all separate categories (see instructions)

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## Part V Schedule of Dividends (see instructions)

| (a) Name of CFC | (b) <br> Date Paid | (c) <br> "Cash dividends" from CFCs |  | (d) Check box if a section 965(a)(2) amount | (e) <br> Column (c)(2) line amounts the corporation specifically identifies as qualifying dividends (see instructions) |
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|  |  | (1) <br> Functional Currency | (2) U.S. <br> Dollars |  |  |
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| Totals |  | . . . |  |  |  |

Part VI
Section 965(b)(2) Base Period Amount (see instructions)
See instructions if the corporation has fewer than 5 tax years in its base period.

| Tax Years in Base Period | $\begin{gathered} \text { (a) } \\ \text { Section 965(b)(2)(B)(i) } \\ \text { dividends } \end{gathered}$ | $\begin{gathered} \text { (b) } \\ \text { Section 965(b)(2)(B)(ii) } \\ \text { inclusions } \end{gathered}$ | $\begin{gathered} \text { (c) } \\ \text { Section 965(b)(2)(B)(iii) } \\ \text { distributions } \end{gathered}$ |  | (d) <br> Total. Add columns (a) through (c) |
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| 41 Most recent tax year ending on or before June 30, 2003 |  |  |  |  |  |
| 42 Tax year prior to line 41 year |  |  |  |  |  |
| 43 Tax year prior to line 42 year |  |  |  |  |  |
| 44 Tax year prior to line 43 year |  |  |  |  |  |
| 45 Tax year prior to line 44 year |  |  |  |  |  |
| 46 Add lines 41 through 45, column (d) . . . . . . . . . . . . . . . . . . . 46 |  |  |  |  |  |
| 47 Enter the largest of lines 41 through 45, column (d) . . . . . . . . . . . . . . . 47 |  |  |  |  |  |
| 48 Enter the smallest of lines 41 through 45 , column (d) . . . . . . . . . . . . . . 48 |  |  |  |  |  |
| 49 Add lines 47 and 48 . . . . . . . . . . . . . . . . . . . . . . . . . 49 |  |  |  |  |  |
| 50 Subtract line 49 from line 46. . . . . . . . . . . . . . . . . . . . . . . 50 |  |  |  |  |  |
| 51 Divide line 50 by 3. (See instructions if the corporation has fewer than 5 tax years in its base period.) Enter the result here and on page 1, line 4 $\qquad$ |  |  |  |  |  |

