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To: Jeffrey Epstein

"U.S. shareholders" of a CFC are required to file Form 5471 with their personal tax return, even if the CFC has no subpart F income. Form 926 is used to report transfers of property (including cash) to a foreign corporation. Since a foreign corporation will have some kind of foreign bank or financial account, the U.S. shareholders who have control, signatory authority or a financial interest, over the account must file Form TD F 90-22.1 by June 30th of the year after the calendar year. If the foreign corporation's shareholders have made an election to have the corporation treated as a disregarded (non-corporate) entity for U.S. tax purposes, then the shareholders must file a Form 8865 for a foreign partnership and a Form 8858 for a foreign disregarded entity. In order to make an election to be treated as a disregarded entity, a Form 8832 must be filed. If the foreign corporation has made an investment in any passive foreign investment companies, or if the foreign corporation is a PFIC, then the U.S. shareholders may be required to file a Form 8621 to report their share of the income of the PFIC or the gain on any dispositions of PFIC shares. If the Foreign Corporation has any U.S.-source income, it will need to file a Form 1120-F. If it is a Foreign Sales Corporation, it will need to file a Form 1120-FSC. In the event of the purchase or sale of a foreign corporation, the buyer and seller will need to file a Form 8883, which is an Asset Allocation Statement. If the shareholders or the corporation rely on a treaty that overrides a provision of the IRC, a Form 8833 must be filed to reflect a Treaty Based Return Position. Depending on the nature of the business of the corporation, other forms may be required

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please note

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