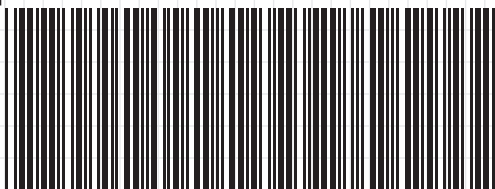


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2019 Schedule FCI

XXXXXXXXXXXXXX

Foreign Corporation Income of U.S. Shareholder

Year beginning XXXXXXXX Ending XXXXXXXX

The U.S. shareholder must provide copies of U.S. Forms 965, 5471, 8992 and 8993 (as filed, with all schedules and supporting statements) with this schedule. All corporate and partnership taxpayers (including stand-alone businesses and combined group members) must complete Part A and Part B below. A U.S. shareholder that is a member of a Massachusetts combined group must also complete Part C below. See instructions.

NAMEOFUSSHAREHOLDERXXXXXXXXXXXXXXXXXXXXX IDNUMBERXXX

Number of foreign corporations for which U.S. shareholder is reporting income XXX

Fill in if U.S. shareholder is a Massachusetts combined group member Combined group election Worldwide Affiliated group Neither

NAMEOFPRINCIPALREPORTINGCORPORATIONOFMA IDNUMBERXXX

Fill in if any foreign corporation for which U.S. shareholder is reporting income is a member of the same Massachusetts combined group as U.S. shareholder

Part A. IRC § 965 Deferred Foreign Income

Deemed repatriated income of U.S. shareholder. IRC § 965 inclusions and deductions.

1.	U.S. shareholder's 2019 IRC § 965(a) inclusion amounts (from 2019 U.S. Form 965, Part I, line 3)	1	XXXXXXXXXXXXXX
2.	U.S. shareholder's 2019 IRC § 965(c) deduction (from 2019 U.S. Form 965, Part II, Section 1, line 17)	2	XXXXXXXXXXXXXX
3.	U.S. shareholder's 2018 IRC § 965(a) inclusion amounts (from 2018 U.S. Form 965, Part I, line 3)	3	XXXXXXXXXXXXXX
4.	U.S. shareholder's total 2018 tax year § 965(c) deduction (from 2018 U.S. Form 965, Part II, Section 1, line 17)	4	XXXXXXXXXXXXXX
5.	U.S. shareholder's 2017 IRC § 965(a) inclusion amounts (from 2018 U.S. Form 965, Part I, line 6)	5	XXXXXXXXXXXXXX
6.	U.S. shareholder's total 2017 tax year § 965(c) deduction (from 2018 U.S. Form 965, Part II, Section 1, line 28)	6	XXXXXXXXXXXXXX

Part B. U.S. Shareholder Income Other Than IRC § 965 Deferred Foreign Income

Subpart F income of U.S. shareholder

1.	U.S. shareholder's 2019 Subpart F income (from 2019 U.S. Form 5471, Schedule I, total of lines 1 through 4)	1	XXXXXXXXXXXXXX
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Global Intangible Low-Taxed Income (GILTI) of U.S. shareholder

2.	U.S. shareholder's 2019 IRC § 951A GILTI (2019 from U.S. Form 8992, Part II, line 3)	2	XXXXXXXXXXXXXX
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Dividends actually received by U.S. shareholder from CFCs

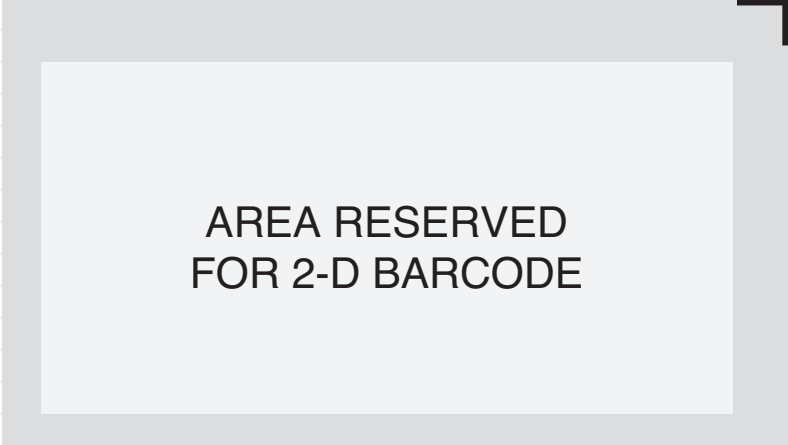
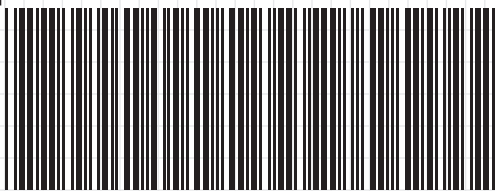
3.	Dividends actually received in 2019 by U.S. shareholder from CFCs (from 2019 U.S. Form 5471, Schedule I, line 5)	3	XXXXXXXXXXXXXX
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2019 Schedule FCI, pg. 2

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IDNUMBERXXX

Part C. Total Dividends of U.S. Shareholder – Massachusetts Combined Group Member

Complete lines 1 through 9 for each year only if U.S. shareholder is a member of a Massachusetts combined group.

- 1. Total of all U.S. and foreign dividends (deemed or actual) of U.S. shareholder (including IRC § 965(a) inclusions, Subpart F income, GILTI and CFC dividends)
- 2. Combined group dividends of U.S. shareholder subject to intercompany elimination
- 3. Total of all dividends of U.S. shareholder not subject to intercompany elimination.
Subtract line 2 from line 1
- 4. Line 3 dividends attributable to U.S. subsidiaries where U.S. shareholder owns less than 15% of voting stock
- 5. Line 3 dividends attributable to foreign subsidiaries where U.S. shareholder owns less than 15% of voting stock
- 6. Line 3 dividends attributable to U.S. shareholder's ownership of RICs, REITs or non-wholly owned DISCs
- 7. Total line 3 taxable dividends of U.S. shareholder. Add lines 4 through 6
- 8. Total line 3 dividends of U.S. shareholder eligible for 95% Massachusetts DRD.
Subtract line 7 from line 3
- 9. 95% Massachusetts DRD of U.S. shareholder. Multiply line 8 by .95

2019

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