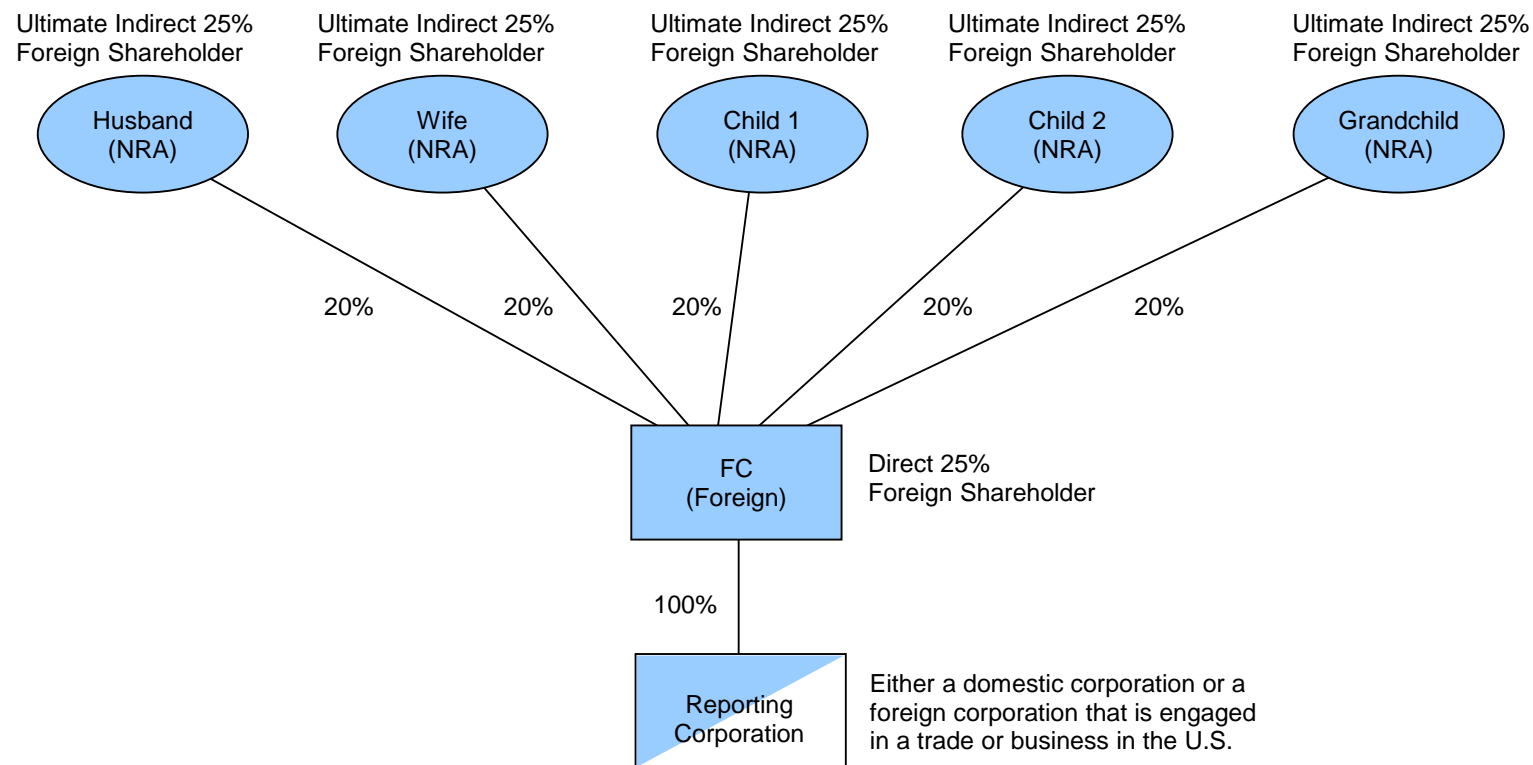


Rev. Proc. 91-55
Example 2

Form 5472: Family Members As Ultimate Indirect 25% Foreign Shareholders

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H, W, C1, C2, and GC, husband, wife, child 1, child 2 and grandchild, each own 20 percent of FC, a foreign corporation, which in turn wholly owns RC, a reporting corporation. (Under the attribution rules of section 318(a)(1), each of H, W, C1, C2, and GC are treated as if each owned all of the stock of FC.) Each of H, W, C1, C2, and GC is an ultimate indirect 25-percent foreign shareholder of RC. FC is a direct 25-percent foreign shareholder. Any two of the individuals H, W, C1, C2, or GC may be reported in Part II of the Form 5472. Information with respect to the individuals not reported in Part II should be provided in an attachment to Form 5472. Information with respect to FC as the direct 25-percent foreign shareholder should also be reported in Part II of Form 5472.

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