and ending , 19	1993

U.S. Income Tax Return of a Foreign Corporation

For calendar year 1993, or tax year beginning, 1993, and ending, 19

See separate instructions.

1993	

iiitei	nai Revenue S	Sel vice		see separate	msuuc	LIUIIS									
print	Name								Employer i	dentification n	umber				
Please type or	Number,	street, and room or suite no. (see	instructions)						Check applicable boxes:						
ty b								eturn \square ame	ended re	turn					
ease	City or to	own, state and ZIP code, or countr	у						=	turn \square cha					
<u> </u>											.9				
Α	Country of	incorporation	G	Check	method of	accounting	g: (1)	Cash (2)	☐ Ac	crual					
В	Foreign co	ountry under whose laws the i	ncome reported o	on this return		_			-						
_	is subject t	to tax			H Did the corporation file a U.S. income tax return							No			
С	Date incorp	porated			for the preceding tax year?										
D	The corpor	ration's books and records are	e maintained by:		I Was the corporation at any time during the tax year										
	Name						ed in a trade								
	Address						corporatio								
		VID code or country					I States for purposes of applying section 894(b) and I								
	ZIP code c	ZIP code or country													
	If the corporate the tax year	oration had an agent in the Ur ar, enter:	nited States at an	y time during			and a forei ," enter the								
	Kind of age	ind of agent													
		lame			K	ls the	corporatio	n a forei	gn person	nal holding					
		dress					-		552 for definition.)						
_							," have you								
		he list on the last page of t n's principal:	he instructions a	nd state the	related parties?										
	(1) Busines	ss activity code number 🕨													
		ss activity >			(Gener	al Instruction	n M1).							
	(3) Product	t or service ▶					number of F				2000 3	and F			
_					Note	s. Auu	ilionai inioni	iation is rec	quireu at tir	e bottom of p	ayes 2	and 5.			
			Computatio	n of Tax D	ue or	Ove	rpaymen	t							
1	Tax fron	n Section I, line 11, page 2							1						
2		n Section II, Schedule J, line							_						
3		m Section III (add lines 6 and													
4		nl holding company tax (attach													
5	Total ta	x. Add lines 1 through 4 .							. 5						
6	Paymen	nts:							_						
а	1992 ov	erpayment credited to 1993	6a		4										
b	1993 es	timated tax payments	6b												
C		3 refund applied for on Form 4466	6c ()	Bal►										
е		oosited with Form 7004				6e									
1		rom regulated investment com	•	-		6f									
g		or Federal tax on fuels (attach	•			6g									
h		ome tax paid or withheld at sou		•		6h									
		rms 8288-A and 8805 (attach							6i						
7	i Total payments. Add lines 6d through 6h								: -						
8	, , , , , , , , , , , , , , , , , , , ,								8						
9									. 9						
10		mount of line 9 you want: Cre						efunded I	. —						
ΡI	ease	Under penalties of perjury, I declar	are that I have examin	ned this return, in	ncluding	accom	panying sched	dules and sta	itements, an	d to the best of	my knov	vledge			
	gn	and belief, it is true, correct, and	compiete. Deciaratio	ni oi preparer (ot	ner inan	ıaxpay	er) is based o	ıı alı iniorma	uon or which	i preparer nas a	iriy KMOW	ieuge.			
	ere	\			<u> </u>			\							
- 10	J1 C	Signature of officer			Da			Title							
Pai	id	Preparer's			Da	ite		Check if s	elf- 🥅	eparer's social s	security n	ıumber			
	eparer's	signature Firm's name (or						employed			<u>i</u>				
	e Only	yours if self-employed) —						E.I. 1		:					
	,	and address						ZIP	code ►						

Form 1120-F (1993) Page **2**

SECTION I.—Certain Gains, Profits, and Income From U.S. Sources That Are NOT Effectively Connected With the Conduct of a Trade or Business in the United States (see instructions)

If you are required to complete Section II or are using Form 1120-F as a claim for refund of tax withheld at source, include below **ALL** income from U.S. sources that is **NOT** effectively connected with the conduct of a trade or business in the United States. Otherwise, include only those items of income on which the U.S. income tax was not fully paid at the source. The rate of tax on each item of **gross** income listed below is 30% (4% for the gross transportation tax) or such lower rate specified by tax treaty. No deductions are allowed against these types of income. Fill in treaty rates where applicable. **If the corporation claimed a lower treaty rate, also complete Item W, page 5**.

Na	me of treaty country, if any ►									
	(a) Nature of income	Gro	(b) ss inco	me		(c) Rate of tax (%)	(d) Amount of tax	Amount of U paid or withhe		
1	Interest									
2	Dividends									
3	Rents									
4	Royalties									
5	Annuities									
6	Gains from disposal of timber, coal, or domestic iron ore with a retained economic interest (attach supporting schedule)									
7	Gains from sale or exchange of patents, copyrights, etc									
8	Fiduciary distributions (attach supporting schedule)									
9	Gross transportation income (see instructions)					4				
10	Other fixed or determinable annual or periodic gains, profits, and income									
11	Total. Enter here and on line 1, page 1					•				
12	Total. Enter here and include on line 6h	, page 1.								
Ad	ditional Information Required (conti	inued fro	m pa	age 1)			<u>'</u>		
М	Is the corporation a personal holding company section 542 for definition.).	/? (See	Yes	No	S		e NOL carryover from prio it by any deduction or		Yes	No
N	Is the corporation a controlled foreign corpo (See section 957 for definition.)	ration?			Т	page 3) ►	n a subsidiary in a parent			
0	Is the corporation a personal service corporation page 8 of instructions for definition.).					controlled group	?			
	Enter tax-exempt interest received or accrued the tax year (see instructions) ▶					number of the pa	arent corporation >			
Q	Did the corporation at the end of the tax year directly or indirectly, 50% or more of the voting of a U.S. corporation? (For rules of attribution section 267(c).)	r own, g stock on, see			U	trust at the endindirectly, 50% of stock? (For rules	I, partnership, corporation I of the tax year own, or more of the corporation of attribution, see section	directly or only on only or only only only only only only only only		
	If "Yes," attach a schedule showing (1) namidentifying number of such U.S. corporation; (2) percowned; and (3) taxable income or (loss) before N special deductions of such U.S. corporation for the tending with or within your tax year.	centage OL and				identifying numb already entered i	chedule showing the ler. (Do not include any i	nformation		
	If the corporation has an NOL for the tax year electing to forego the carryback period, of here				No	ote: Additional info	ormation is required at the	e bottom of p	page 5.	

Form 1120-F (1993) Page **3**

SECTION II.—Income Effectively Connected With the Conduct of a Trade or Business in the United States (see instructions) **IMPORTANT**—Fill in all applicable lines and schedules. If you need more space, see General Instruction M3. 1a Gross receipts or sales ______ b Less returns and allowances ______ c Bal ▶ 1c 2 3 **3** Gross profit (subtract line 2 from line 1c) 4 Income 5 6 7 8 8 Capital gain net income (attach Schedule D (Form 1120)) 9 Net gain or (loss) from Form 4797, Part II, line 20 (attach Form 4797) 10 10 11 12 Compensation of officers (Schedule E, line 4). Deduct only amounts connected with a U.S. business (See instructions for limitations on deductions.) 13c 14 15 15 16 16 17 18 18 Interest deduction allowable under Regulations section 1.882-5 19 **19** Charitable contributions (see instructions for 10% limitation) . 21 Less depreciation claimed on Schedule A and elsewhere on return 21 22 23 24 25 27 **Deductions** 28 29 29 Taxable income before NOL deduction and special deductions (subtract line 28 from line 11) . **b** Special deductions (Schedule C, line 15). 30b 30c 31 Taxable income or (loss). Subtract line 30c from line 29 31 Schedule A Cost of Goods Sold (see instructions) 1 2 3 4 Additional section 263A costs (see instructions—attach schedule) 5 6 7 Cost of goods sold. Subtract line 7 from line 6. Enter here and on Section II, line 2. . . . 9a Check all methods used for valuing closing inventory: ☐ Cost ☐ Lower of cost or market as described in Regulations section 1.471-4 ☐ Writedown of subnormal goods as described in Regulations section 1.471-2(c) ☐ Other (Specify method used and attach explanation.) ▶ If checked, attach Form 970. c If the LIFO inventory method was used for this tax year, enter percentage (or amounts) of closing **d** Do the rules of section 263A (for property produced or acquired for resale) apply to the corporation? . . . ☐ Yes ☐ No

e Was there any change in determining quantities, cost, or valuations between opening and closing inventory?

If "Yes," attach explanation.

☐ Yes

☐ No

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Sc	chedule C Dividends and Spe	cial Deductions (see	instructions)	(a) Divider		o) %	(c) Special deductions:
1	Dividends from less-than-20%-owned subject to the 70% deduction (other th			received	, ,	70	(a) × (b)
2	Dividends from 20%-or-more-owned	domestic corporations			90		
_	subject to the 80% deduction (other th					80 see	
	Dividends on debt-financed stock of domestic					uctions 42	
	Dividends on certain preferred stock of le Dividends on certain preferred stock of 2	•				48	
	Dividends from less-than-20%-owner	·					
	subject to the 70% deduction				-	70	
7	Dividends from 20%-or-more-owned fo to the 80% deduction	reign corporations that a	are subject			80	
	Total. Add lines 1 through 7. See instr						
	Other dividends from foreign corporation						
	Foreign dividend gross-up (section 78)						
	IC-DISC and former DISC dividends not inclu	aea on lines 1, 2, or 3 (sec	tion 246(d))				
	Other dividends	nroforred stock of a n	· · · · -				
	Deduction for dividends paid on certain Total dividends. Add lines 1 through 12						
15	Total deductions. Add lines 8 and 13. E	nter here and on line 30	b, page 3				
	chedule E Compensation of C			12, page 3	.)		
	Complete Schedule E on	y if total receipts (line 1a	plus lines 4 th			3) are	\$500,000 or more.
	(a) Name of officer	(b) Social security	(c) Percent of time devoted	Percent of stock			(f) Amount of
	(a) Name of officer	number	to business	(d) Common	(e) Preferred		compensation
1			%		%		
			%		%		
			%		<u>%</u>		
			%		%		
			%		<u>%</u> %		
			%				
2	Total compensation of officers		,,,	70	70		
3	Compensation of officers claimed		sewhere on th	is return .			
4	Subtract line 3 from line 2. Enter the				· · · ·		
Sc	chedule J Tax Computation (s	ee instructions)					
1	Check if the corporation is a member	er of a controlled group	see sections	s 1561 and 15	63) ▶ □		
2 a	If the box on line 1 is checked, ea	nter the corporation's	share of the	\$50,000, \$25	,000, and		
	\$9,925,000 taxable income bracke	amounts (in that order			1 1		
	(1) \[\\$ \] (2)	\$	(3) [\$				
b	Enter the corporation's share of:	+++ == a) ¢		1 1			
	(1) additional 5% tax (not more that						
2	(2) additional 3% tax (not more that	\$100,000,	od poroseel -	orvice ecos	otion (ccc		
3	Income tax. Check this box if the opage 15 of the instructions) ▶ □	corporation is a qualifi		ervice corpor	auon (see	3	
42	Foreign tax credit (attach Form 11			a			
b				b			
c	Check: Nonconventional source						
	QEV credit (attach For	m 8834)	4	С			
C	General business credit. Enter here an	d check which forms are	e attached:				
	☐ Form 3800 ☐ Form 346						
	☐ Form 6478 ☐ Form 676						
	☐ Form 8830 ☐ Form 882		′ -	d			
-	, , , , , , , , , , , , , , , , , , , ,			e		5	
5	Total credits. Add lines 4a through					6	
6 7	Subtract line 5 from line 3 Recapture taxes. Check if from:					7	
	Alternative minimum tax (attach Fo						
b						8b	
9					page 1.	9	

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	TION III.—Branch Profits Tax and Tax or I—Branch Profits Tax	Exce	ess Ir	ntere	est (see instructions)		
					1		
1	Enter the amount from line 29, Section II, page						
2	Enter total amount of adjustments to arrive at a instructions for types of adjustments as well as in effectively connected taxable income but not connected earnings and profits, and the treatment Attach a schedule showing the nature and amount of the schedule showing the schedule showing the schedule showing the schedule sche	rtain types of income included nt when computing effectively s apportioned to that income. ustments					
3	Effectively connected earnings and profits. Comb	oine line	e 1 an	id line	e 2 and enter the result here . 3		
4a	Enter U.S. net equity at the end of the current						
b	Enter U.S. net equity at the end of the prior ta	•					
С	Increase in U.S. net equity. If line 4a is greater line 4a. Enter the result here and skip to line 4a						
	Decrease in U.S. net equity. If line 4b is greater enter the result here						
е	Non-previously taxed accumulated effectively if any, of effectively connected earnings and page 1986 over any dividend equivalent amounts for	orofits	for pr	eced	ling tax years beginning after		
5	Dividend equivalent amount. If an amount is en 3 and enter the result here. Enter -0- if the res is entered on line 4c, add the lesser of line 4d	ult is e	equal	to or	less than zero. If no increase		
6	Branch profits tax. Multiply the amount on line is a qualified resident or otherwise qualifies for 3, page 1. See instructions for the requirements of qualified resident; and special rules for foreign their U.S. trade or business during the tax years.	treaty for quant or corpo	benet dificat oration	fits). ion fo ns tha	Enter here and include on line or treaty benefits; the definition at have completely terminated		
Par	II—Tax on Excess Interest				1 9 1		
7a	Enter the amount of interest reported on line 1	8, Sec	tion II	, pac	ie 3		
b	Enter the amount of interest apportioned to the corporation that is capitalized or otherwise nor Add lines 7a and 7b.	ne effe	ctively	con			
8	Enter the amount of branch interest (inclinaterest). (See instructions for definition.) If the U.S. trade or business was increased becaute assets are U.S. assets, check this box	he inte se 809	erest % or	paid more	by the foreign corporation's		
9a	Excess interest. Subtract line 8 from line 7c. En						
	If the foreign corporation is a bank, enter the a deposits. Otherwise, enter -0	mount	of ex	cess	interest treated as interest on		
С	Subtract line 9b from line 9a				9c		
10	Tax on excess interest. Multiply line 9c by 30 qualified resident or otherwise qualifies for treapage 1. Also complete Items W and X below	aty ber	nefits)	. Ente	er here and include on line 3,		
Add	tional Information Required (continued from page 2)						
V	s the corporation claiming a reduction in, or	Yes	No	\//	Is the corporation taking a position on this return	Yes	No
•	exemption from, the branch profits tax due to:				that a U.S. tax treaty overrules or modifies an Internal Revenue law of the United States		
	1) A complete termination of all U.S. trades or businesses?				thereby causing a reduction of tax?		
	The tax-free liquidation or reorganization of a foreign corporation?	Note: Failure to disclose a treaty-based return position may result in a penalty of \$10,000 (see section 6712).					
	(3) The tax-free incorporation of a U.S. trade or X If the				If the corporation is claiming it is a qualified resident of its country of residence for purposes		
İ	f (1) applies, or if (2) applies and the transferee s domestic, attach Form 8848.				of computing its branch profits tax and excess interest tax, check the basis for that claim:		
	f (3) applies, attach the statement required by Regulations section 1.884-2T(d)(5).				Stock ownership and base erosion test		. 🗆

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Co	Additional schedules to be co			,	
S C	hedule L Balance Sheets		of tax year		tax year
	ASSETS	(a)	(b)	(c)	(d)
1	Cash				
	Trade notes and accounts receivable	((
_	Less allowance for bad debts)			
3	Inventories				
4	U.S. government obligations				
5 6	Other current assets (attach schedule)				
7	Loans to stockholders				
8	Mortgage and real estate loans				
	Other investments (attach schedule).				
	Buildings and other fixed depreciable assets				
	Less accumulated depreciation	()		()	
	Depletable assets				
	Less accumulated depletion	()		()	
	Land (net of any amortization)				
	Intangible assets (amortizable only) .				
	Less accumulated amortization	()		()	
14	Other assets (attach schedule)				
15	Total assets				
LIAI	BILITIES AND STOCKHOLDERS' EQUITY				
16	Accounts payable				
17	Mtges., notes, bonds payable in less than 1 year				
	Other current liabilities (attach schedule)				
19	Loans from stockholders				
20	Mtges., notes, bonds payable in 1 year or more				
21	Other liabilities (attach schedule)				
22	•				
	b Common stock				
	Paid-in or capital surplus				
24	Retained earnings—Appropriated (attach schedule)				
25	Retained earnings—Unappropriated .		(
	Less cost of treasury stock Total liabilities and stockholders' equity		,		/
	hedule M-1 Reconciliation of Inc	come or (Loss) ner	· Rooks With Incor	ne ner Return (You	are not required to
	complete this schedu				
1	Net income (loss) per books				
	Federal income tax			d on books this year this return (itemize):	
3	Excess of capital losses over capital gains			rest, \$	
4	Income subject to tax not recorded on		-		
•	books this year (itemize):			is return not charged	
				me this year (itemize):	
5	Expenses recorded on books this year			\$	
	not deducted on this return (itemize):			yover \$	
а	Depreciation \$				
	Contributions carryover \$		9 Add lines 7 and	8	
	Travel and entertainment \$		10 Income (line 29,	page 3)—line 6 less	
	Add lines 1 through 5		line 9	<u> </u>	
Sc	hedule M-2 Analysis of Unapproto to complete this sch	opriated Retained I	Earnings per Book	s (line 25 above) (\	You are not required
	·	edule ii tile tutai as	-		<u> </u>
	Balance at beginning of year			Cash	
	Net income (loss) per books			Stock	
3	Other increases (itemize):			Property	
				s (itemize):	
				ough 6	
4	Add lines 1, 2, and 3			year (line 4 less line 7)	