

DIVISION OF REVENUE AND TAXATION

Department of Finance

Commonwealth of the Northern Mariana Islands

CNMI Income Tax Return of a Foreign Corporation



For	m 1	120	F-CM	For calendar year 2014, or tax ye	ar beginning • See separate				nding		., 20	20	14	
		Nar			, see separate			-	Emplo	yer identi	fication	number		
0	ype r rint	Nui	mber, street, ar	nd room or suite no. (see instructio	ons)					box(es) if: me or addre			return return	
		City	y or town, state	e and ZIP code, or country (see inst	ructions)					st post-mer nedule M-3	_		nded retu ctive retu	
Α	Coun	try of i	ncorporation	<u> </u>		Н	Did th	ne corpo	ration's method	of accou	nting c	hange	Yes	No
В	Forei	gn cou	ıntry under w	hose laws the income reporte	ed on this return			•	eeding tax year					
		s also subject to tax						n a statement wi	•					
		•				'			ration's method the preceeding t					
D				on's primary books and record					n a statement wi					
	pı (3) Dı	ovince	e or state, and	d country)		J	Did th	ne corpo	ration file a CNA	11 income	tax ret	urn for		
	(2) Pr	incipa 	. ·	worldwide business					ig tax year? .					
	CI	NMI, cl	heck here .	intains an office or place of bu	▶□	К			e during the tax y n a trade or busin			oration		
E			ration had ar ·, enter:	n agent in the CNMI at any time	e during				taxpayer's trade			nin the		
		•							ale or disposition					
	(2) Na	ame				١.								
	(3) Ad	ddress				-			ration have a pe t in the CNMI for		s of any	/		
							applio	cable tax	treaty between	the CNM	11			
_	See t	ho inct		l enter the corporation's princi					country? the name of the					
				e number			II res	s, enter	the name of the	loreign	ountry	•		
			activity			М	Did th	e corpor	ation have any tr	ansactions	with re	elated parties?		
	(3) Pr	oduct	or service				M Did the corporation have any transactions with related parties? If "Yes," Form 5472 may have to be filed (see instructions).							
G	Checl	k meth	od of accour	nting: (1) \square Cash (2)	2)		Ente	r numbe	r of Forms 5472	attached	•			
	(3)	Ot	her (specify)	-		No	te: Aa	lditional	information is re	quired on	page 2.			
				Com	putation of Tax D	ue or	r Ove	rpaym	ent					
1				ie 11, Page 2			-	1						
2				hedule J, line 9, page 4 .				2						
3				dd lines 6 and 10 on page 5)				3			_			
4				I through 3		·i	· .				4			
5			. ,	edited to 2014	 									
				ayments ed for on Form 4466)							
			e lines 5a thro					5d						
			sited with Fo	3				5e						
		•		undistributed capital gains (at				5f						
	g Cre	edit fo	r federal tax p	paid on fuels (attach Form 413	6). See instructions .		.	5g						
	h Re	fundal	ble credit fro	m Form 8827, line 8c				5h						
i				id or withheld at source (add li										
				nd 8805 (attach Forms 8288-A	**		<u>_</u>	5i						
اِ				lines 5d through 5i							5j			
6				(see instructions). Check if Fo						▶ □	6 7			
7 8				e 5j is smaller than the total of e 5j is larger than the total of li						• •	/ 8a			
				on line 8a resulting from tax deduc							8b			
9		ter po	rtion of line 8	Ba you want Credited to 2015 es	stimated tax (see supple	menta	al instru	uctions).			9			
c:						ing schedules and statements, and to the best of tion of which preparer has any knowledge.			f my knowle	dge and				
	gn		, , , , , ,		1				,			May the Division Taxation discuss	this return	n with
Н	ere	Ciona	ature of officer		Date	▶ -	Γitle					(see instructions)	?	
_		Signa			1		iiue		Date		7	PTIN	No	
	id		riiit/Type pr	eparer's name	Preparer's Signature				Duic	Check self-emp				
	epar		Firm's name	•						Firm's E				
UJS	se On	IIY	Firm's addres							Phone				

Form 1120F-CM (2014) Page 2 Yes Nο **Additional Information** (continued from page 1) At the end of the tax year, did any individual, partnership, No Yes corporation, estate, or trust own, directly or indirectly, **N** Is the corporation a controlled foreign corporation? 50% or more of the corporation's voting stock? (See (See section 957(a) for definition) section 267(c) for rules of attribution) . . . **O** Is the corporation a personal service corporation? If "Yes," attach a statement showing the name and (See instructions for definition) identifying number. (Do not include any information already entered in item T.) Enter percentage owned Enter tax-exempt interest received or accrued during the tax year (see instructions) > \$ Is the corporation taking a position on this return that a CNMI tax treaty overrrules or modifies tax law of the CNMI, thereby **Q** At the end of the tax year, did the corporation own, causing a reduction of tax? directly or indirectly, 50% or more of the voting stock If "Yes," the corporation is generally required to complete of a CNMI corporation? and attach Form 8833. See Form 8833 for exceptions. (See section 267(c) for rules of attribution.) If "Yes," attach a statement showing (1) name and EIN of such **Note:** Failure to disclose a treaty-based return position CNMI corporation; (2) percentage owned; and (3) may result in a \$10,000 penalty (see section 6712). taxable income or (loss) before NOL and special During the tax year, did the corporation own any entity deductions of such CNMI corporation for the tax year that was disregarded as an entity separate from its owner ending with or within your tax year. under Regulations sections 301.7701-2 and 301.7701-3? **R** If the corporation has an NOL for the tax year and If "Yes," attach a statement listing the name, country under whose is electing to forego the carryback period, check laws the entity was organized, and EIN (if any) of each such entity. (1) Did a partnership allocate to the corporation a distributive share **S** Enter the available NOL carryover from prior tax of income from a directly owned partnership interest, any of years. (Do not reduce it by any deduction on which is ECI or treated as ECI by the partnership or the partner? line 30a, page 3 ▶ \$ If "Yes," attach Schedule P. See instructions. **T** Is the corporation a subsidiary in a parent-subsidiary (2) During the tax year, did the corporation own directly or indirectly, at least 10% interest, in any foreign partnership? If "Yes," enter the parent corporation's: If "Yes," see instructions for required attachment. **Z** (1) Has the corporation engaged in any transactions the results of which are subject to the arm's length standard under section 482 and its regulations? (2) Has the corporation recognized any interbranch **U** (1) Is the corporation a dealer under section 475? amounts? If "Yes," attach statement (see instructions) (2) Did the corporation mark to market any securities Is the corporation required to file Schedule UTP (Form or commodities other than in a dealer capacity? 1120), Uncertain Tax Position Statement (see instructions)? If "Yes", complete and attach Schedule UTP. SECTION I— Income From CNMI Sources Not Effectively Connected With the Conduct of a Trade or Business in the CNMI—Do not report items properly withheld and reported on Form 1042-S. See instructions. Report all gross transportation income subject to 4% tax on line 9. Report other column (a) income items only if not properly withheld and reported on Form 1042-S. The rate on tax on these gross income items is 30% or such lower rate specified by tax treaty. No deductions are allowed against these types of income. Enter treaty rates where applicable. If the corporation is claiming a lower treaty rate, also complete item W above. If multiple treaty rates apply to a type of income (e.g., subsidiary and portfolio dividends or dividends received by disregarded entities), attach a statement showing the amounts, tax rates, and withholding for each. Name of treaty country, if any ▶ (b) (c) (d) Amount of CNMI income tax Class of income (see instructions) Rate of tax (%) Amount of tax liability Gross amount paid or withheld at the source 1 Dividends 2 3 Rents Royalties . Gains from disposal of timber, coal, or domestic iron ore with a retained economic interest (attach supporting statement) Gains from sale or exchange of patents, Fiduciary distributions (attach supporting statement) Gross transportation income (see instructions) Other items of income Total. Enter here and include on line 5i, page 1 . . .

Is the corporation fiscally transparent under the laws of the foreign jurisdiction with respect to any item of income listed above?

If "Yes," attach a statement that provides the information requested above with respect to each such item of income.

Yes

SECTION II - Income Effectively Connected with the Conduct of a Trade or Business in the CNMI (see instructions) **Important:** Fill in all applicable lines and schedules. If you need more space, see **Assembling the Return** in the instructions. 1a Gross receipts or sales ______ b Less returns and allowances _____ ncome Compensation of officers (see instructions—attach Form 1125-E) **Deductions** (See instructions for limitations on deductions.) Bad debts (for bad debts over \$500,000, attach a list of debtors and amounts) Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562). Advertising . . Pension, profit-sharing, etc., plans Deductions allocated and apportioned to ECI from Schedule H, line 20 (see instructions) Taxable income before NOL deduction and special deductions (subtract line 28 from line 11) 30a **Less**: **a** Net operating loss deduction (see instructions) 30b **b** Special deductions (Schedule C, line 15) 30c **c** Add lines 30a and 30b 31 Taxable income or (loss). Subtract line 30c from line 29

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	TION II—Income Effectively Connected With the Conduct of a Trade or Business in the CN ntinued)	MI	
Sch	nedule C Dividends and Special Deductions (see instructions)		
1	Dividends from less-than-20%-owned domestic corporations (other than	(b) %	(c) Special deductions: (a) x (b)
	debt-financed stock)	70	
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)	80	
3	Dividends on debt-financed stock of domestic and foreign corporations (section 246A)	see instructions	
4	Dividends on certain preferred stock of less-than-20%-owned public utilities	42	
5	Dividends on certain preferred stock of 20%-or-more-owned public utilities .	48	
6	Dividends from less-than-20%-owned foreign corporations	70	
7	Dividends from 20%-or-more-owned foreign corporations	80	
8	Total. Add lines 1 through 7. See instructions for limitation		
9	Dividends from foreign corporations not included on lines 3, 6, or 7		
10	Foreign dividend gross-up (section 78)		
11	IC-DISC and former DISC dividends not included on lines 1, 2, or 3 (section 246(d))		
12	Other dividends		
13	Deduction for dividends paid on certain preferred stock of public utilities		
14	Total dividends. Add lines 1 through 12. Enter here and on line 4, page 3.		
15	Total special deductions. Add lines 8 and 13. Enter here and on line 30b, page 3	. •	
Scl	nedule J Tax Computation (see instructions)		
1	Check if the corporation is a member of a controlled group (attach Schedule O (Form 1120)) ▶		
2	Income tax. Check if a qualified personal service corporation (see instructions)	2	
3	Alternative minimum tax (attach Form 4626)	. 3	
4	Add lines 2 and 3	4	
5a	Foreign tax credit (attach Form 1118)		
b	General business credit (attach Form 3800)		
c	Credit for prior year minimum tax (attach Form 8827)		
d	Bond credits from Form 8912		
6	Total credits. Add lines 5a through 5d	6	
7	Subtract line 6 from line 4	7	
8	Other taxes. Check if from: Form 4255 Form 8611 Form 8697		
	Form 8866 Form 8902 Other (attach statement)	. 8	
9	Total tax. Add lines 7 and 8. Enter here and on line 2, page 1	. 9	

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Form 1120F-CM (2014) Page 5 SECTION III—Branch Profits Tax and Tax on Excess Interest Part I—Branch Profits Tax (see instructions) 2 Enter total adjustments to line 1 to get effectively connected earnings and profits. (Attach required statement showing the nature and amount of adjustments.) (See instructions.) Effectively connected earnings and profits. Combine line 1 and line 2 3 3 Enter CNMI net equity at the end of the current tax year. (Attach required statement.) 4a 4a 4b Increase in CNMI net equity. If line 4a is greater than or equal to line 4b, subtract line 4b from line 4a. Enter the c 4с d Decrease in CNMI net equity. If line 4b is greater than line 4a, subtract line 4a from line 4b 4d Non-previously taxed accumulated effectively connected earnings and profits. Enter excess, if any, of effectively connected earnings and profits for preceding tax years beginning after 1986 over any dividend equivalent amounts Dividend equivalent amount. Subtract line 4c from line 3. If zero or less, enter -0-. If no amount is entered on line 4c, 5 Branch profits tax. Multipy line 5 by 30% (or lower treaty rate if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See instructions.) Enter here and include on line 3, page 1. Also complete item W on 6 Part II—Tax on Excess Interest (see instructions for this Part and for Schedule I (Form 1120-F)) b Enter the inverse of the total amount deferred, capitalized, and disallowed from Schedule I, line 24d (i.e., if 7b 7c **Branch Interest** (see instructions for definition): Enter the sum of Schedule I, line 9, column (c), and Schedule I, line 22. If the interest paid by the foreign corporation's CNMI trade or business was increased because 80% or more of 9a Excess interest. Subtract line 8 from line 7c. If zero or less, enter -0- 9a **b** If the foreign corporation is a bank, enter the excess interest treated as interest on deposits. (see instructions for rules for computing this amount). Otherwise, enter zero. 9b 9с **Tax on excess interest.** Multiply line 9c by 30% or lower treaty rate (if the corporation is a qualified resident or otherwise qualifies for treaty benefits). (See instructions.) Enter here and include on line 3, page 1. Also complete Dart III Additional Information

rait iii—Additional information										
		Yes	No							
11 Is the corporation claiming a reduction in, or exemption from, the branch profits tax due to:										
a A complete termination of all CNMI trade or businesses?										
b The tax-free liquidation or reorganization of a foreign corporation?										
c The tax-free incorporation of a CNMI trade or business?	•									
If 11a or 11b applies and the transferee is a domestic corporation, attach Form 8848. If 11c applies, attach the statement required by			i							
Temporary Regulations section 1.884-2T(d)(5).										

	11 11 201 CM (2014)				
	e: Check if completing on ► CNMI bas	sis or Worldwide ba	sis.		
Scl	nedule L Balance Sheets per Books				
	·	Beginning o	of tax year	End of ta	ax year
	Assets	(a)	(b)	(c)	(d)
1	Cash				
2a	Trade notes and accounts receivable				
b	Less allowance for bad debts	(()	
3	Inventories				
4	CNMI government obligations				
5	Tax-exempt securities (see instructions)				
	Interbranch current assets*				
b	Other current non-CNMI assets*				
	Other current CNMI assets*				
	Loans to shareholders				
8					
	Other loans and investments—non-CNMI				
Ja	assets*				
b	Other loans and investments—CNMI assets* .				
	Buildings and other depreciable assets				
	Less accumulated depreciation	()		()	
	Depletable assets	,			
	Less accumulated depletion	((
	Land (net of any amortization)	,			
	Intangible assets (amortizable only)				
	Less accumulated amortization	((
	Assets held in trust	,		,	
	Other non-current interbranch assets*				
	Other non-current non-CNMI assets*				
	Other non-current CNMI assets*				
	Total assets				
	Liabilities				
18	Accounts payable				
19					
19	1 year:				
а	Interbranch liabilities*				
	Third-party liabilities*				
	Other current liabilities*				
21	Loans from shareholders				
	Mortgages, notes, bonds payable in 1 year or				
~~	more:				
a	Interbranch liabilities*				
	Third-party liabilities*				
	Liabilities held in trust				
	Other interbranch liabilities*				
	Other third-party liabilities*				
	Equity				
25	Capital stock: a Preferred stock				
	b Common stock				
26	Additional paid-in capital				
27	Retained earnings—Appropriated*				
28	Retained earnings—Unappropriated				
29	Adjustments to shareholders' equity*				
30	Less cost of treasury stock		()		()
31	Total liabilities and shareholders' equity		, ,		,
					İ

Sch	overpayment Resulting From Tax Deducted and Withheld Under Chapters 3 and 4	
1	Total Chapter 3 and 4 payments. Enter the amount from page 1, line 5i	
2	Enter the tax amount from page 1, line 1	
3	Enter the portion of the tax amount shown on page 1, line 2 pertaining to income associated with amounts deducted and withheld under sections 1445 and 1446 (see instructions for general guidelines)	
4	Total Chapter 3 and 4 tax. Combine lines 2 and 3	
5	Tentative overpayment resulting from tax deducted and withheld under Chapters 3 and 4.	
	Subtract line 4 from line 1	
6	Enter the amount from page 1, line 8a	
7	Overpayment resulting from tax deducted and withheld under Chapters 3 and 4.	
	Enter the smaller of line 5 or line 6. Enter the result here and on page 1, line 8b	

Form **1120F-CM** (2014)



DIVISION OF REVENUE AND TAXATION

Department of Finance





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Form	os	6-3405A FOR USE WITH FORM 1120F-CN	(See instructions on reverse side)	2014	. S. C. FIGHTE GOL SIVE!	
		orate Name	,		TIN	
N	/lailin	g Address	Telephone ()	number	Contact person	
PAR	TΑ	- NON-REFUNDABLE CREDITS	'			
1 B	usin	ess gross revenue tax				
		Name	Tax ID No.			
a)			a) [
b)			b)			
		fees paid	— <u> </u>			
		s and taxes imposed under 4CMC §2202(h) (see				
		non-refundable credits (add lines 1 through 3)	4			
		- REBATE COMPUTATION	- I			
		NMTIT				
		non-refundable credits (enter amount from line 4	•			
		te offset base (subtract line 7 from line 5. If zero IT overpayment. If line 6 is greater than line 8, s				-
		Trioverpayment. If line 8 is greater than line 6, s			9	1
		te offset amount (see instructions on reverse sid		wise effici -0-		
	CDa	te onset amount (see instructions on reverse sie				
PAF	RT (C - CHAPTER 7 TAX ADJUSTMENT (See sup	plemental instructions.)			
1 Tax	unc	derpaid before rebate offset. Enter amount from line	10 above		1	
2 Tax	ove	erpaid before rebate offset. Enter amount from line 9	above		2	,
3 Rel	bate	offset amount. Enter the amount from line 11 above			3	
		and interest. imated tax penalty. Check if Form 2220 is attached	•		4a	
5 Tax	on	nalty for late filing and or payment, and interest charges overpayment of credit. Enter the lesser of line 2 of the form 1120F-CM		as shown on	4b	
		ue (or overpaid). Add lines 1 through 5 of this part. If	this line shows amount due, nay this s	amount Ston		
		this line shows an overpayment, place a bracket arour			6	
		, , , ,	,			
7 Am	ount	you want credited to your ${\bf 2015}~{\bf ESTIMATED}~{\bf TAX}~$.			7	
8 Ne	t ove	erpayment. Add line 6 and line 7			8	
		Under penalties of perjury, I declare that I have examined belief, it is true, correct and complete. Declaration of prep				e and
SIGN		,			, , , , , , , , , , , , , , , , , , , ,	
HERE	=	Signature of officer	Date Title			
		, 3	,		Dreperer's social seem	rity po
PAID		Print/Type Preparer's name Pre	parer's Signature	Date	Check if self-employed Preparer's social secu	шку по.
REPAI		Firm's name	1	Date		
JSE ON	ILY	Firm's address			EIN	
		i iiii 3 duuless			Telephone no. ()	

		FOR OFFICIAL	L USE ONLY		
	DATE PAID	AMOUNT PAID	RECEIPT NO.	VERIFIED BY	POSTED BY

OS-3405A SUPPLEMENTAL INSTRUCTIONS FOR 1120F-CM (2014)

General

- Name and address. Fill in name and address.
- TIN. Enter taxpayer identification number.

PART A. NON-REFUNDABLE CREDITS

- Enter the amount of business gross revenue tax paid or accrued during the taxable year under 4CMC Chapter 3. For partners and/
 or shareholders of a sub-chapter S corporation, your share of BGRT should be in accordance with the percentage of profit or losses,
 or the equity, whichever is applicable. If you have more than one business name, list each one separately with its respective TIN
 and amount of BGRT. This is the tax imposed under 4CMC §1301.
- 2. Enter the amount of user fees paid during the taxable year under 4CMC §1421.
- 3. Enter the amount of fees and taxes paid or accrued during the taxable year under 4CMC §2202(h), in lieu of the tax imposed under 4CMC §1301.
- 4. Add all amounts shown in lines 1 through 3.

PART B. REBATE COMPUTATION

- 5. Enter the tax from Form 1120F-CM, page 1 line 4.
- 6. Enter the total payments made for the taxable year from Form 1120F-CM, page 1, line 5j.
- 7. Enter the total non-refundable credits from part A, line 4 above.
- 8. Rebate offset base. Subtract line 7 from line 5. If zero or less, enter zero.
- 9. If line 6 is greater than line 8, subtract line 8 from line 6. Otherwise enter zero.
- 10. If line 8 is greater than line 6, subtract line 6 from line 8. Otherwise enter zero.
- 11. Compute the amount on line 8 as shown on the rebate table below.

PART C - CHAPTER 7 TAX ADJUSTMENT

- 1 Tax underpaid before rebate offset. Enter amount from line 10 above.
- 2 Tax overpaid before rebate offset. Enter amount from line 9 above.
- 3 Rebate offset amount. Enter the amount from line 11 above.
- 4a Enter the estimated tax penalty. Make sure to check the checkbox if Form 2220 is attached.
- 4b Enter the total amount of late charges for failure to file on time, failure to pay on time, and interest.
- 5 Tax on overpayment of credit. Enter the lesser of line 2 (ignore bracket) of this Part or the total of lines 5g and 5h as shown on Form 1120F-CM, page 1. If zero or less, enter -0-.
- **Total due (or overpaid).** Add lines 1 through 5 of this part. If this line shows amount due, pay this amount. **Stop here**. If this line shows an overpayment, place a bracket around the figure and continue on lines 7, 8 and 9.
- 7 If line 6 is an overpayment, enter amount you want credited to your 2015 estimated tax.
- 8 Net overpayment. Add line 6 and line 7.

REBATE TABLE						
IF REBATE OFFSET						
BASE (line 8) IS:	THE REBATE OFFSET AMOUNT IS:	EXAMPLE:				
Not over \$20,000	90% of the rebate offset base	Rebate offset base x 90%				
\$20,000-\$100,000	\$18,000 plus 70% of the rebate offset base over \$20,000	Rebate offset base - 20,000 x 70% + 18,000				
Over \$100,000	\$74,000 plus 50% of the rebate offset base over \$100,000	Rebate offset base - 100,000 x 50% + 74,000				

If filing by mail, please send to: DIVISION OF REVENUE AND TAXATION

POST OFFICE BOX 5234 CHRB

SAIPAN, MP 96950

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