

Roger Rabbit Inc.

00-000004

**FORM 1120 TEST SCENARIO 4**

This ATS Scenario should only be used if supporting Form 8975.

**FORMS REQUIRED:** 1120, Sch G (F1120), Sch M-3 (F1120), Sch N (F1120), 926, 1118, Sch J (F1118), 5471, Sch E (5471), Sch H (F5471), Sch J (F5471), Sch M (F5471), Sch O (F5471), 5472, 8832, 8858 (2), F8975, Schedule A (F8975) (3)**ATTACHMENTS:**ItemizedOtherDeductionsSchedule  
ItemizedOtherCurrentAssetsSchedule  
ItemizedOtherInvestmentSchedule  
ItemizedOtherInvestmentsSchedule  
NonincludibleForeignEntitySchedule  
OtherIncomeLossItemsWithDifferencesSchedule  
OtherExpenseDeductionItemsWithDifferencesSchedule  
Category3FilerStatement  
ItemizedOtherDeductionsSchedule2  
ItemizedOtherCurrentAssetsSchedule  
ItemizedOtherCurrentLiabilitesSchedule  
ItemizedOtherLiabilitiesSchedule  
EarningsAndProfitsOtherAdjStmt**BINARY ATTACHMENTS:** Organizational Chart for Form 5471 Sch O**HEADER INFO:** Not on actual form**MultipleSoftwarePackagesUsed:** No**Originator:** EFIN: Self-select  
Type: ERO  
Practitioner PIN:  
EFIN: Self-select  
PIN: Self-select  
PIN Entered by: ERO**Signature Option:** PIN Number**Officer:** Name: Poppy Seed  
Title: Chief Executive Officer  
Officer SSN: 000-00-1234  
Taxpayer PIN: Self-select  
Phone: 888-555-1212  
Email Address:  
poppyseed@john.com  
Date signed: 02/15/2024**Preparer Name:**  
**Date Prepared:** Johnny Appleseed  
**IRS PAYMENT:** 02/12/2024  
**Prior Year Income Amt:** N/A  
\$0

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Name Control:

ROGE

**Additional notes:** Form 1118 with Separate Category GEN has no information on page 4, 6, 7, 8, 9, 10, 11, 13, and 14

**Attachment 1, F1120, Line 26, Other Deductions (ItemizedOtherDeductionsSchedule)**

Description	Amount
Audit Fees	68,160,000
Professional Expenses	31,227,000
Financial Service Costs	21,000,000
<b>TOTAL*</b>	<b>120,387,000</b>

\*The total amount is not part of the dependency schema; it is for illustrative purposes only.

**Attachment 2, F1120, Schedule L, Line 6(b) & (d), Other Current Assets (ItemizedOtherCurrentAssetsSchedule)**

Other Current Asset Description	Beginning Amount	Ending Amount
Pre-paid Expenses & Special Deposits	35,726,000	35,726,000

**Attachment 3, F1120, Schedule L, Line 9 (b) & (d), Other Investments (ItemizedOtherInvestmentsSchedule)**

Other Investment Description	Beginning Amount	Ending Amount
Investments in Subsidiaries	139,197,191,000	250,072,971,000

**Attachment 4, F1120, Schedule M-3, Line 5 (a), Net Income From Nonincludible Foreign Entities (NonincludibleForeignEntitySchedule)**

Name	EIN	Net income (loss) Amount	Total Assets	Total liabilities	Net amounts
Foreign Finance Corporation	APPLD FOR	41,193,236,000	76,436,862,000	6,395,936,000	70,040,926,000

**Attachment 5, F1120, Sch M-3, Part II, Line 25, Other Income (Loss) Items with Differences (OtherIncomeLossItemsWithDifferencesSchedule)**

Description	Income (Loss) per Income Statement Amount	Temporary Difference Amount	Permanent Difference Amount	Other Permanent Differences for Allocations to Non-ECI and ECI	Income (Loss) per Tax Return Amount
Recovery of Expense	512,526,000	-512,526,000	0	0	0

**Attachment 6, F1120, Schedule M-3, Part III, Line 38, Other Expenses/Deduction Items with Differences (OtherExpenseDeductionItemsWithDifferencesSchedule)**

Description	Expense per Income Statement Amount	Temporary Difference Amount	Permanent Difference Amount	Other Permanent Differences for Allocations to Non-ECI and ECI	Deductions per Tax Return Amount
Other Expense	(256,260,000)	256,260,000	0	0	0

**Attachment 7, F5471, Box B (3), Category of filer checkboxes (Category3FilerStatement)**

Amount of Indebtedness	0
Type of Indebtedness	New acquisition
Name	Foreign Finance Corporation
US Address	75 Any Street, Austin, TX 78737
EIN/SSN/Missing EIN	APPLD FOR
Number of Shares	1000

**Attachment 8, F5471, Sch C, Line 17, Other Deductions (ItemizedOtherDeductionsSchedule2)**

Description	Foreign Amount	Amount
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Miscellaneous Deductions	199,936,000	295,720,000
Operating Supplies	356,382,000	527,114,000
<b>TOTAL*</b>	<b>556,318,000</b>	<b>822,834,000</b>

\*The total amount is not part of the dependency schema; it is for illustrative purposes only.

**Attachment 9, F5471, Schedule F, Line 5 (a) & (b), Other Current Assets (ItemizedOtherCurrentAssetsSchedule)**

Other Current Asset Description	Beginning Amount	Ending Amount
Miscellaneous	255,108,000	243,012,000

**Attachment 10, F5471, Schedule F, Line 8 (a) & (b), Other Investments (ItemizedOtherInvestmentSchedule)**

Other Investment Description	Beginning Amount	Ending Amount
Investments in Stock (Non-affiliated)	57,437,000	36,820,277,000

**Attachment 11, F5471, Schedule F, Line 16 (a) & (b), Other Current Liabilities (ItemizedOtherCurrentLiabilitiesSchedule)**

Other Current Liability Description	Beginning Amount	Ending Amount
Other accrued liabilities	4,001,670,000	5,080,202,000

**Attachment 12, F5471, Schedule F, Line 19 (a) & (b), Other Liabilities (ItemizedOtherLiabiilitesSchedule)**

Other Liability Description	Beginning Amount	Ending Amount
Deferred Federal Income Taxes	2,016,428,000	1,247,422,000

**Attachment 13, F5471, Schedule H, Line 2i, Other (EarningsAndProfitsOtherAdjStmt)**

Recognize Exchange Gain on Note (Net Additions)	1,848,728,000
Reverse Stock Write-down (Net Additions)	86,410,000
Reverse Book Remediation Reserve (Net Additions)	11,146,000
<b>TOTAL* (Net Additions)</b>	<b>1,946,284,000*</b>
Reverse Book Exchange Gain (Net Subtractions)	515,184,000
<b>TOTAL* (Net Subtractions)</b>	<b>515,184,000*</b>

\*The total amount is not part of the dependency schema; it is for illustrative purposes only.

U.S. Corporation Income Tax Return

OMB No. 1545-0123

2023

Form 1120 Department of the Treasury Internal Revenue Service

For calendar year 2023 or tax year beginning , 2023, ending , 20

Go to www.irs.gov/Form1120 for instructions and the latest information.

A Check if:

- 1a Consolidated return (attach Form 851)
b Life/nonlife consolidated return
2 Personal holding co. (attach Sch. PH)
3 Personal service corp. (see instructions)
4 Schedule M-3 attached

TYPE OR PRINT

Name: Roger Rabbit Inc.
Number, street, and room or suite no. If a P.O. box, see instructions: 35 Any Street
City or town, state or province, country, and ZIP or foreign postal code: Anytown, NY 10006

B Employer identification number

00-0000004
C Date incorporated: 08-01-1985
D Total assets (see instructions): \$ 250,306,361,000

E Check if: (1) Initial return (2) Final return (3) Name change (4) Address change

Table with 11 columns: Line number, Description, and Amount. Rows include Income (1a-11), Deductions (12-29c), and Tax, Refundable Credits, and Payments (30-37).

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Signature of officer, Date, Title

May the IRS discuss this return with the preparer shown below? See instructions. Yes No

Table for Paid Preparer Use Only with fields for name, signature, date, firm name, address, EIN, and phone number.

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Form 1120 (2023)

<b>Schedule C Dividends, Inclusions, and Special Deductions</b> (see instructions)		(a) Dividends and inclusions	(b) %	(c) Special deductions (a) × (b)
1	Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)		50	
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)		65	
3	Dividends on certain debt-financed stock of domestic and foreign corporations		See instructions	
4	Dividends on certain preferred stock of less-than-20%-owned public utilities		23.3	
5	Dividends on certain preferred stock of 20%-or-more-owned public utilities		26.7	
6	Dividends from less-than-20%-owned foreign corporations and certain FSCs		50	
7	Dividends from 20%-or-more-owned foreign corporations and certain FSCs		65	
8	Dividends from wholly owned foreign subsidiaries		100	
9	<b>Subtotal.</b> Add lines 1 through 8. See instructions for limitations		See instructions	
10	Dividends from domestic corporations received by a small business investment company operating under the Small Business Investment Act of 1958		100	
11	Dividends from affiliated group members		100	
12	Dividends from certain FSCs		100	
13	Foreign-source portion of dividends received from a specified 10%-owned foreign corporation (excluding hybrid dividends) (see instructions)		100	
14	Dividends from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 (including any hybrid dividends)			
15	Reserved for future use			
16a	Subpart F inclusions derived from the sale by a controlled foreign corporation (CFC) of the stock of a lower-tier foreign corporation treated as a dividend (attach Form(s) 5471) (see instructions)	43,668,620,000	100	43,668,620,000
b	Subpart F inclusions derived from hybrid dividends of tiered corporations (attach Form(s) 5471) (see instructions)			
c	Other inclusions from CFCs under subpart F not included on line 16a, 16b, or 17 (attach Form(s) 5471) (see instructions)			
17	Global Intangible Low-Taxed Income (GILTI) (attach Form(s) 5471 and Form 8992)			
18	Gross-up for foreign taxes deemed paid			
19	IC-DISC and former DISC dividends not included on line 1, 2, or 3			
20	Other dividends			
21	Deduction for dividends paid on certain preferred stock of public utilities			
22	Section 250 deduction (attach Form 8993)			
23	<b>Total dividends and inclusions.</b> Add column (a), lines 9 through 20. Enter here and on page 1, line 4	43,668,620,000		
24	<b>Total special deductions.</b> Add column (c), lines 9 through 22. Enter here and on page 1, line 29b			43,668,620,000

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Schedule J Tax Computation and Payment (see instructions)

Part I—Tax Computation

Table with 11 main rows and sub-rows (5a-5e, 9a-9z) for tax computation. Includes items like Income tax, Base erosion minimum tax amount, Corporate alternative minimum tax, Foreign tax credit, Total credits, and Total tax. Values range from 0 to 100,000,000.

Part II—Payments and Refundable Credits

Table with 13 main rows and sub-rows (20a-20z) for payments and refundable credits. Includes items like Reserved for future use, Current year's estimated tax payments, Total payments, and Total payments and credits. Values range from 0 to 100,000,000.

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Form 1120 (2023)

Schedule K Other Information (see instructions)

1 Check accounting method: a [ ] Cash b [x] Accrual c [ ] Other (specify)
2 See the instructions and enter the:
a Business activity code no. 522293
b Business activity International Finance
c Product or service International Finance
3 Is the corporation a subsidiary in an affiliated group or a parent-subsidary controlled group? [x]
4 At the end of the tax year:
a Did any foreign or domestic corporation, partnership... [x]
b Did any individual or estate own directly 20% or more... [x]
5 At the end of the tax year, did the corporation:
a Own directly 20% or more... [x]

Table with 4 columns: (i) Name of Corporation, (ii) Employer Identification Number (if any), (iii) Country of Incorporation, (iv) Percentage Owned in Voting Stock. Row 1: Foreign Finance Association, UK, 100%

b Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below.

Table with 4 columns: (i) Name of Entity, (ii) Employer Identification Number (if any), (iii) Country of Organization, (iv) Maximum Percentage Owned in Profit, Loss, or Capital. All cells are empty.

6 During this tax year, did the corporation pay dividends (other than stock dividends and distributions in exchange for stock) in excess of the corporation's current and accumulated earnings and profits? See sections 301 and 316 [x]
7 At any time during this tax year, did one foreign person own, directly or indirectly, at least 25% of the total voting power of all classes of the corporation's stock entitled to vote or at least 25% of the total value of all classes of the corporation's stock? [x]
8 Check this box if the corporation issued publicly offered debt instruments with original issue discount [ ]
9 Enter the amount of tax-exempt interest received or accrued during this tax year \$
10 Enter the number of shareholders at the end of the tax year (if 100 or fewer)
11 If the corporation has an NOL for the tax year and is electing to forego the carryback period, check here (see instructions) [ ]
12 Enter the available NOL carryover from prior tax years (do not reduce it by any deduction reported on page 1, line 29a) \$

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Form 1120 (2023)

Schedule K Other Information (continued from page 4)

Table with 3 columns: Question number, Question text, and Yes/No columns. Contains 31 numbered questions regarding corporate receipts, assets, and tax requirements.



**Tax Year 2023**  
**1120 MeF ATS Scenario 4**

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Schedule L Balance Sheets per Books		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
<b>Assets</b>					
1	Cash . . . . .		250,328,000		192,664,000
2a	Trade notes and accounts receivable . . . . .				
b	Less allowance for bad debts . . . . .	( )		( )	
3	Inventories . . . . .				
4	U.S. government obligations . . . . .				
5	Tax-exempt securities (see instructions) . . . . .				
6	Other current assets (attach statement) . . . . .		35,726,000		35,726,000
7	Loans to shareholders . . . . .		5,000,000		5,000,000
8	Mortgage and real estate loans . . . . .				
9	Other investments (attach statement) . . . . .		139,197,191,000		250,072,971,000
10a	Buildings and other depreciable assets . . . . .				
b	Less accumulated depreciation . . . . .	( )		( )	
11a	Depletable assets . . . . .				
b	Less accumulated depletion . . . . .	( )		( )	
12	Land (net of any amortization) . . . . .				
13a	Intangible assets (amortizable only) . . . . .				
b	Less accumulated amortization . . . . .	( )		( )	
14	Other assets (attach statement) . . . . .				
15	<b>Total assets</b> . . . . .		<b>139,488,245,000</b>		<b>250,306,361,000</b>
<b>Liabilities and Shareholders' Equity</b>					
16	Accounts payable . . . . .				
17	Mortgages, notes, bonds payable in less than 1 year . . . . .				
18	Other current liabilities (attach statement) . . . . .				
19	Loans from shareholders . . . . .				
20	Mortgages, notes, bonds payable in 1 year or more . . . . .				
21	Other liabilities (attach statement) . . . . .				
22	Capital stock: a Preferred stock . . . . .				
	b Common stock . . . . .	5,000,000	5,000,000	5,000,000	5,000,000
23	Additional paid-in capital . . . . .		139,231,622,000		249,913,859,000
24	Retained earnings—Appropriated (attach statement) . . . . .				
25	Retained earnings—Unappropriated . . . . .		251,623,000		387,502,000
26	Adjustments to shareholders' equity (attach statement) . . . . .				
27	Less cost of treasury stock . . . . .	( )		( )	
28	<b>Total liabilities and shareholders' equity</b> . . . . .		<b>139,488,245,000</b>		<b>250,306,361,000</b>

**Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return**

Note: The corporation may be required to file Schedule M-3. See instructions.

1	Net income (loss) per books . . . . .		7	Income recorded on books this year not included on this return (itemize):	
2	Federal income tax per books . . . . .			Tax-exempt interest \$ _____	
3	Excess of capital losses over capital gains . . . . .			_____	
4	Income subject to tax not recorded on books this year (itemize): _____		8	Deductions on this return not charged against book income this year (itemize):	
5	Expenses recorded on books this year not deducted on this return (itemize):		a	Depreciation . . . \$ _____	
a	Depreciation . . . . . \$ _____		b	Charitable contributions \$ _____	
b	Charitable contributions . . . \$ _____			_____	
c	Travel and entertainment . . . \$ _____		9	Add lines 7 and 8 . . . . .	
6	Add lines 1 through 5 . . . . .		10	Income (page 1, line 28)—line 6 less line 9	

**Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Schedule L, Line 25)**

1	Balance at beginning of year . . . . .	251,623,000	5	Distributions: a Cash . . . . .	
2	Net income (loss) per books . . . . .	135,879,000		b Stock . . . . .	
3	Other increases (itemize): _____			c Property . . . . .	
	_____		6	Other decreases (itemize): _____	
	_____		7	Add lines 5 and 6 . . . . .	
4	Add lines 1, 2, and 3 . . . . .	387,502,000	8	Balance at end of year (line 4 less line 7)	387,502,000



**Tax Year 2023**  
**1120 MeF ATS Scenario 4**  
**Net Income (Loss) Reconciliation for Corporations**  
**With Total Assets of \$10 Million or More**

OMB No. 1545-0123

▶ **Attach to Form 1120 or 1120-C.**  
 ▶ **Go to [www.irs.gov/Form1120](http://www.irs.gov/Form1120) for instructions and the latest information.**

Name of corporation (common parent, if consolidated return) <u>Roger Rabbit Inc.</u>	Employer identification number <u>00-0000004</u>
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- Check applicable box(es): (1)  Non-consolidated return (2)  Consolidated return (Form 1120 only)  
 (3)  Mixed 1120/L/PC group (4)  Dormant subsidiaries schedule attached

**Part I Financial Information and Net Income (Loss) Reconciliation** (see instructions)

- 1a** Did the corporation file SEC Form 10-K for its income statement period ending with or within this tax year?  
 **Yes.** Skip lines 1b and 1c and complete lines 2a through 11 with respect to that SEC Form 10-K.  
 **No.** Go to line 1b. See instructions if multiple non-tax-basis income statements are prepared.
- b** Did the corporation prepare a certified audited non-tax-basis income statement for that period?  
 **Yes.** Skip line 1c and complete lines 2a through 11 with respect to that income statement.  
 **No.** Go to line 1c.
- c** Did the corporation prepare a non-tax-basis income statement for that period?  
 **Yes.** Complete lines 2a through 11 with respect to that income statement.  
 **No.** Skip lines 2a through 3c and enter the corporation's net income (loss) per its books and records on line 4a.
- 2a** Enter the income statement period: Beginning MM/DD/YYYY Ending MM/DD/YYYY
- b** Has the corporation's income statement been restated for the income statement period on line 2a?  
 **Yes.** (If "Yes," attach an explanation and the amount of each item restated.)  
 **No.**
- c** Has the corporation's income statement been restated for any of the five income statement periods immediately preceding the period on line 2a?  
 **Yes.** (If "Yes," attach an explanation and the amount of each item restated.)  
 **No.**
- 3a** Is any of the corporation's voting common stock publicly traded?  
 **Yes.**  
 **No.** If "No," go to line 4a.
- b** Enter the symbol of the corporation's primary U.S. publicly traded voting common stock
- c** Enter the nine-digit CUSIP number of the corporation's primary publicly traded voting common stock

<b>4a</b> Worldwide consolidated net income (loss) from income statement source identified in Part I, line 1	<b>4a</b>	41,193,236,000
<b>b</b> Indicate accounting standard used for line 4a (see instructions): (1) <input type="checkbox"/> GAAP (2) <input type="checkbox"/> IFRS (3) <input type="checkbox"/> Statutory (4) <input type="checkbox"/> Tax-basis (5) <input type="checkbox"/> Other (specify) _____		
<b>5a</b> Net income from nonincludible foreign entities (attach statement)	<b>5a</b>	( 41,193,236,000)
<b>b</b> Net loss from nonincludible foreign entities (attach statement and enter as a positive amount)	<b>5b</b>	
<b>6a</b> Net income from nonincludible U.S. entities (attach statement)	<b>6a</b>	( )
<b>b</b> Net loss from nonincludible U.S. entities (attach statement and enter as a positive amount)	<b>6b</b>	
<b>7a</b> Net income (loss) of other includible foreign disregarded entities (attach statement)	<b>7a</b>	
<b>b</b> Net income (loss) of other includible U.S. disregarded entities (attach statement)	<b>7b</b>	
<b>c</b> Net income (loss) of other includible entities (attach statement)	<b>7c</b>	
<b>8</b> Adjustment to eliminations of transactions between includible entities and nonincludible entities (attach statement)	<b>8</b>	
<b>9</b> Adjustment to reconcile income statement period to tax year (attach statement)	<b>9</b>	
<b>10a</b> Intercompany dividend adjustments to reconcile to line 11 (attach statement)	<b>10a</b>	
<b>b</b> Other statutory accounting adjustments to reconcile to line 11 (attach statement)	<b>10b</b>	
<b>c</b> Other adjustments to reconcile to amount on line 11 (attach statement)	<b>10c</b>	
<b>11 Net income (loss) per income statement of includible corporations.</b> Combine lines 4 through 10. <b>Note:</b> Part I, line 11, must equal Part II, line 30, column (a), or Schedule M-1, line 1 (see instructions).	<b>11</b>	135,879,000

**12** Enter the total amount (not just the corporation's share) of the assets and liabilities of all entities included or removed on the following lines.

	Total Assets	Total Liabilities
<b>a</b> Included on Part I, line 4	326,743,223,000	6,395,936,000
<b>b</b> Removed on Part I, line 5	76,436,862,000	6,395,936,000
<b>c</b> Removed on Part I, line 6		
<b>d</b> Included on Part I, line 7		

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Schedule M-3 (Form 1120) (Rev. 12-2019)

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Name of corporation (common parent, if consolidated return) <b>Roger Rabbit Inc.</b>	Employer identification number <b>00-0000004</b>
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return)	Employer identification number

**Part II Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return** (see instructions)

	(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
<b>Income (Loss) Items</b> (Attach statements for lines 1 through 12)				
1 Income (loss) from equity method foreign corporations				
2 Gross foreign dividends not previously taxed . . . . .		43,668,620,000		43,668,620,000
3 Subpart F, QEF, and similar income inclusions . . . . .				
4 Gross-up for foreign taxes deemed paid . . . . .				
5 Gross foreign distributions previously taxed . . . . .				
6 Income (loss) from equity method U.S. corporations				
7 U.S. dividends not eliminated in tax consolidation . . . . .				
8 Minority interest for includible corporations . . . . .				
9 Income (loss) from U.S. partnerships . . . . .				
10 Income (loss) from foreign partnerships . . . . .				
11 Income (loss) from other pass-through entities . . . . .				
12 Items relating to reportable transactions . . . . .				
13 Interest income (see instructions) . . . . .				
14 Total accrual to cash adjustment . . . . .				
15 Hedging transactions . . . . .				
16 Mark-to-market income (loss) . . . . .				
17 Cost of goods sold (see instructions) . . . . .	( )			( )
18 Sale versus lease (for sellers and/or lessors) . . . . .				
19 Section 481(a) adjustments . . . . .				
20 Unearned/deferred revenue . . . . .				
21 Income recognition from long-term contracts . . . . .				
22 Original issue discount and other imputed interest . . . . .				
23a Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities				
b Gross capital gains from Schedule D, excluding amounts from pass-through entities . . . . .				
c Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses . . . . .				
d Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses . . . . .				
e Abandonment losses . . . . .				
f Worthless stock losses (attach statement) . . . . .				
g Other gain/loss on disposition of assets other than inventory				
24 Capital loss limitation and carryforward used . . . . .				
25 Other income (loss) items with differences (attach statement)	512,526,000	(512,526,000)		
26 <b>Total income (loss) items.</b> Combine lines 1 through 25	512,526,000	43,156,094,000		43,834,479,000
27 <b>Total expense/deduction items</b> (from Part III, line 39)	(256,260,000)	256,260,000		0
28 Other items with no differences . . . . .	(120,387,000)			(120,387,000)
29a Mixed groups, see instructions. All others, combine lines 26 through 28 . . . . .	135,879,000	43,412,354,000		43,548,233,000
b PC insurance subgroup reconciliation totals . . . . .				
c Life insurance subgroup reconciliation totals . . . . .				
30 <b>Reconciliation totals.</b> Combine lines 29a through 29c	135,879,000	43,412,354,000		43,548,233,000

**Note:** Line 30, column (a), must equal Part I, line 11, and column (d) must equal Form 1120, page 1, line 28.

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Schedule M-3 (Form 1120) (Rev. 12-2019)

Page **3**

Name of corporation (common parent, if consolidated return) <u>Roger Rabbit Inc.</u>	Employer identification number 00-0000004
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return)	Employer identification number

**Part III Reconciliation of Net Income (Loss) per Income Statement of Includible Corporations With Taxable Income per Return—Expense/Deduction Items** (see instructions)

	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 U.S. current income tax expense . . . . .				
2 U.S. deferred income tax expense . . . . .				
3 State and local current income tax expense . . . . .				
4 State and local deferred income tax expense . . . . .				
5 Foreign current income tax expense (other than foreign withholding taxes) . . . . .				
6 Foreign deferred income tax expense . . . . .				
7 Foreign withholding taxes . . . . .				
8 Interest expense (see instructions) . . . . .				
9 Stock option expense . . . . .				
10 Other equity-based compensation . . . . .				
11 Meals and entertainment . . . . .				
12 Fines and penalties . . . . .				
13 Judgments, damages, awards, and similar costs . . . . .				
14 Parachute payments . . . . .				
15 Compensation with section 162(m) limitation . . . . .				
16 Pension and profit-sharing . . . . .				
17 Other post-retirement benefits . . . . .				
18 Deferred compensation . . . . .				
19 Charitable contribution of cash and tangible property . . . . .				
20 Charitable contribution of intangible property . . . . .				
21 Charitable contribution limitation/carryforward . . . . .				
22 Domestic production activities deduction (see instructions). . . . .				
23 Current year acquisition or reorganization investment banking fees . . . . .				
24 Current year acquisition or reorganization legal and accounting fees . . . . .				
25 Current year acquisition/reorganization other costs . . . . .				
26 Amortization/impairment of goodwill . . . . .				
27 Amortization of acquisition, reorganization, and start-up costs . . . . .				
28 Other amortization or impairment write-offs . . . . .				
29 Reserved . . . . .				
30 Depletion . . . . .				
31 Depreciation . . . . .				
32 Bad debt expense . . . . .				
33 Corporate owned life insurance premiums . . . . .				
34 Purchase versus lease (for purchasers and/or lessees) . . . . .				
35 Research and development costs . . . . .				
36 Section 118 exclusion (attach statement) . . . . .				
37 Section 162(r)—FDIC premiums paid by certain large financial institutions (see instructions) . . . . .				
38 Other expense/deduction items with differences (attach statement) . . . . .	256,260,000	-256,260,000		0
39 <b>Total expense/deduction items.</b> Combine lines 1 through 38. Enter here and on Part II, line 27, reporting positive amounts as negative and negative amounts as positive . . . . .	256,260,000	-256,260,000		0

October 05, 2023

Tax Year 2023
1120 MeF ATS Scenario 4

Foreign Operations of U.S. Corporations

OMB No. 1545-0123

Department of the Treasury
Internal Revenue Service

Attach to Form 1120, 1120-C, 1120-IC-DISC, 1120-L, 1120-PC, 1120-REIT, 1120-RIC, or 1120-S.
Go to www.irs.gov/Form1120 for the latest information.

2023

Name
Roger Rabbit Inc.

Employer identification number (EIN)
00-0000004

Foreign Operations Information

Table with 3 columns: Question, Yes, No. Contains 10 rows of questions regarding foreign operations, such as 'During the tax year, did the corporation own (directly or indirectly) any foreign entity...' and 'Enter the number of Forms 8858 attached to the corporation's tax return...'.

October 05, 2023

Form 926

(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

Tax Year 2023
1120 MeF ATS Scenario 4
Return by a U.S. Transferor of Property
to a Foreign Corporation

Go to www.irs.gov/Form926 for instructions and the latest information.
Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Attachment
Sequence No. 128

Part I U.S. Transferor Information (see instructions)

Name of transferor: Roger Rabbit, Inc.
Identifying number (see instructions): 00-0000004

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?
2 If the transferor was a corporation, complete questions 2a through 2d.
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?
b Did the transferor remain in existence after the transfer?
If not, list the controlling shareholder(s) and their identifying number(s).

Table with 2 columns: Controlling shareholder, Identifying number

- c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?
If not, list the name and employer identification number (EIN) of the parent corporation.

Table with 2 columns: Name of parent corporation, EIN of parent corporation

- d Have basis adjustments under section 367(a)(4) been made?

- 3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
a List the name and EIN of the transferor's partnership.

Table with 2 columns: Name of partnership, EIN of partnership

- b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?
c Is the partner disposing of its entire interest in the partnership?
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation): Foreign Finance Corporation
5a Identifying number, if any: 00-0000045

6 Address (including country): 75 Any Street, Birmingham, England 126375
5b Reference ID number (see instructions): ABC1234

7 Country code of country of incorporation or organization (see instructions): UK

8 Foreign law characterization (see instructions): Corporation

- 9 Is the transferee foreign corporation a controlled foreign corporation?

**Part III Information Regarding Transfer of Property** (see instructions)

**Section A—Cash**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	09/30/2023		100,333,000		

**10** Was cash the only property transferred? . . . . .  Yes  No  
If “Yes,” skip the remainder of Part III and go to Part IV.

**Section B—Other Property (other than intangible property subject to section 367(d))**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	08/25/2023	IDD Stock	25,752,000	35,452,000	0
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? . . . . .  Yes  No

**12a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? . . . . .  Yes  No  
If “Yes,” go to line 12b.

**b** Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . .  Yes  No  
If “Yes,” continue to line 12c. If “No,” skip lines 12c and 12d, and go to line 13.

**c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? . . . . .  Yes  No  
If “Yes,” continue to line 12d. If “No,” skip line 12d, and go to line 13.

**d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_

**13** Did the transferor transfer property described in section 367(d)(4)? . . . . .  Yes  No  
If “No,” skip Section C and questions 14a through 15.

**Section C—Intangible Property Subject to Section 367(d)**

Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm’s length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						



- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?
b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?
c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?
d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii)
15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
(a) Before 100% (b) After 100%
17 Type of nonrecognition transaction (see instructions)
18 Indicate whether any transfer reported in Part III is subject to any of the following.
a Gain recognition under section 904(f)(3)
b Gain recognition under section 904(f)(5)(F)
c Recapture under section 1503(d)
d Exchange gain under section 987
19 Did this transfer result from a change in entity classification?
20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)
c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

**Tax Year 2023**  
**1120 MeF ATS Scenario 4**  
**Foreign Tax Credit—Corporations**

OMB No. 1545-0123

Attach to the corporation's tax return.  
 Go to [www.irs.gov/Form1118](http://www.irs.gov/Form1118) for instructions and the latest information.

Attachment  
 Sequence No. **118**

For calendar year 20 23, or other tax year beginning \_\_\_\_\_, 20\_\_\_\_, and ending \_\_\_\_\_, 20\_\_\_\_

Name of corporation  
 Roger Rabbit Inc.

Employer identification number  
 00-0000004

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) . . . . . GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . \_\_\_\_\_
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . \_\_\_\_\_

**Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)**

1. EIN or Reference ID Number (see instructions)*	2. Foreign Country or U.S. Possession (enter two-letter code— use a separate line for each) (see instructions)	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)				4. Dividends (see instructions)	5. Interest
		(a) Exclude Gross-Up		(b) Gross-Up (section 78)			
<b>A</b>	00-0000004	UK	43,668,620,000				
<b>B</b>							
<b>C</b>							
<b>Totals</b> (add lines A through C)			43,668,620,000				

6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Currency Gain	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
<b>A</b>						43,668,620,000
<b>B</b>						
<b>C</b>						
<b>Totals</b>						43,668,620,000

13. Allocable Deductions						
(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		(f) Expenses Allocable to Sales Income	(g) Expenses Allocable to Gross Income From Performance of Services
			(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses		
<b>A</b>	43,668,620,000					
<b>B</b>						
<b>C</b>						
<b>Totals</b>						

13. Allocable Deductions (continued)				14. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part I, column (b); Part II, column (f); and Part III, column (g))	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other Allocable Deductions (attach schedule) (see instructions)	(k) Total Allocable Deductions (add columns 13(a) through 13(h) and 13(j))				
<b>A</b>		120,387,000	43,789,007,000			43,789,007,000	-120,387,000
<b>B</b>							
<b>C</b>							
<b>Totals</b>							

\* For section 863(b) income, NOLs, income from RICs, high-taxed income, section 951A, and reattribution of income by reason of disregarded payments, use a single line (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

**Tax Year 2023  
1120 MeF ATS Scenario 4**

**October 05, 2023**

Form 1118 (Rev. 12-2022)

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**Schedule B Foreign Tax Credit** (Report all foreign tax amounts in U.S. dollars.)

**Part I – Foreign Taxes Paid, Accrued, and Deemed Paid** (see instructions)

1. Credit Is Claimed for Taxes (check one):		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)					
<input type="checkbox"/> Paid <input type="checkbox"/> Accrued		Tax Withheld at Source on:					
Date Paid	Date Accrued	(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
<b>A</b>							
<b>B</b>							
<b>C</b>							
<b>Totals</b> (add lines A through C)							

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:			(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
(g) Sales	(h) Services Income	(i) Other		
<b>A</b>				11,788,082
<b>B</b>				
<b>C</b>				
<b>Totals</b>				

**Part II – Separate Foreign Tax Credit** (Complete a separate Part II for each applicable category of income.)

<b>1a</b>	Total foreign taxes paid or accrued (total from Part I, column 2(j))		
<b>b</b>	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)		
<b>2</b>	Total taxes deemed paid (total from Part I, column 3)	11,788,082	
<b>3</b>	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I)	( 11,788,082 )	
<b>4</b>	Taxes reclassified under high-tax kickout		
<b>5</b>	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year		
<b>6</b>	Total foreign taxes (combine lines 1a through 5)		<b>6</b>
<b>7</b>	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is <b>not</b> required to be completed, enter the result from the "Totals" line of column 17 of the applicable Schedule A		<b>7</b> 0
<b>8a</b>	Total taxable income from all sources (enter taxable income from the corporation's tax return)	0	
<b>b</b>	Adjustments to line 8a (see instructions)		
<b>c</b>	Subtract line 8b from line 8a		<b>8c</b> 0
<b>9</b>	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1		<b>9</b> 0
<b>10</b>	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)		<b>10</b>
<b>11</b>	Multiply line 9 by line 10		<b>11</b>
<b>12</b>	Increase in limitation (section 960(c))		<b>12</b>
<b>13</b>	Credit limitation (add lines 11 and 12) (see instructions)		<b>13</b>
<b>14</b>	<b>Separate foreign tax credit</b> (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III		<b>14</b> 0

**Tax Year 2023  
1120 MeF ATS Scenario 4**

**October 05, 2023**

Form 1118 (Rev. 12-2022)

Page **3**

**Schedule B Foreign Tax Credit** (Report all foreign tax amounts in U.S. dollars.) (continued)

**Part III—Summary of Separate Credits** (Enter amounts from Part II, line 14, for each applicable category of income. Do not include taxes paid to sanctioned countries.)

<b>1</b>	Credit for taxes on section 951A category income	<b>1</b>	
<b>2</b>	Credit for taxes on foreign branch category income	<b>2</b>	
<b>3</b>	Credit for taxes on passive category income	<b>3</b>	
<b>4</b>	Credit for taxes on general category income	<b>4</b>	0
<b>5</b>	Credit for taxes on section 901(j) category income (combine all such credits on this line)	<b>5</b>	
<b>6</b>	Credit for taxes on income re-sourced by treaty (combine all such credits on this line)	<b>6</b>	
<b>7</b>	Total (add lines 1 through 6)	<b>7</b>	
<b>8</b>	Reduction in credit for international boycott operations (see instructions)	<b>8</b>	
<b>9</b>	<b>Total foreign tax credit</b> (subtract line 8 from line 7). Enter here and on the appropriate line of the corporation's tax return	<b>9</b>	0

**Schedule C Tax Deemed Paid With Respect to Section 951(a)(1) Inclusions by Domestic Corporation Filing Return (Section 960(a))**

Use this schedule to report the tax deemed paid by the corporation with respect to section 951(a)(1) inclusions of earnings from foreign corporations under section 960(a). For each line in Schedule C, include the column 10 amount in column 3 of the line in Schedule B, Part I, that corresponds with the identifying number specified in column 1 of Schedule A and that also corresponds with the identifying number entered in column 1b of this Schedule C (see instructions).

1a. Name of Foreign Corporation	1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	1c. Tested Unit Reference ID (if applicable)
Foreign Finance Corp	00-000045	

2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code— see instructions)	4. Functional Currency of Foreign Corporation (enter code— see instructions)	5. Subpart F Income Group		
			(a) Reg. sec. 1.960-1(d)(2)(ii)(B)(2) (enter code)	(b) Reg. sec. 1.904-4(c)(3)(i)-(iv) (enter code)	(c) Unit
202312	UK	GBP			

6. Total Net Income in Subpart F Income Group (in functional currency of foreign corporation)	7. Total Eligible Current Year Taxes in Subpart F Income Group (in U.S. dollars)	8. Section 951(a)(1) Inclusion Attributable to Subpart F Income Group		9. Divide Column 8(a) by Column 6	10. Tax Deemed Paid (multiply column 7 by column 9)
		(a) Functional Currency	(b) U.S. Dollars		
161,917,394	3,180,665	600,093,170	43,688,620	3.70616865	11,788,082

**Total** (add amounts in column 10) 11,788,082

**Tax Year 2023  
1120 MeF ATS Scenario 4**

**October 05, 2023**

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**Schedule D Tax Deemed Paid With Respect to Section 951A Income by Domestic Corporation Filing the Return (Section 960(d))**

Use this schedule to figure the tax deemed paid by the corporation with respect to section 951A inclusions of earnings from foreign corporations under section 960(d).

**Part I—Foreign Corporation’s Tested Income and Foreign Taxes**

1a. Name of Foreign Corporation		1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)		2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code)
5. Pro Rata Share of CFC’s Tested Income From Applicable Form 8992 Schedule (see instructions)	6. CFC’s Tested Income From Applicable Form 8992 Schedule (see instructions)	7. Divide Column 5 by Column 6		8. CFC’s Tested Foreign Income Taxes From Schedule Q (Form 5471) (see instructions)	9. Pro Rata Share of Tested Foreign Income Taxes Paid or Accrued by CFC (multiply column 7 by column 8)	
<b>Total</b> (add amounts in column 5)				<b>Total</b> (add amounts in column 9)		

**Part II—Foreign Income Tax Deemed Paid**

1. Global Intangible Low-Taxed Income (section 951A inclusion)	2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total	3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	4. Tax Deemed Paid (Multiply Part II, column 3, by 80% (0.80). Enter the result here and include on the line of Schedule B, Part I, column 3, that corresponds with the line with “951A” in column 2 of Schedule A.)

**October 05, 2023**  
**Schedule J**  
**(Form 1118)**

(Rev. December 2020)  
 Department of the Treasury  
 Internal Revenue Service

**Tax Year 2023**  
**1120 MeF ATS Scenario 4**  
**Adjustments to Separate Limitation Income (Loss) Categories for**  
**Determining Numerators of Limitation Fractions, Year-End Recharacterization Balances,**  
**and Overall Foreign and Domestic Loss Account Balances**  
 For calendar year 20 20, or other tax year beginning \_\_\_\_\_, 20 \_\_\_\_\_, and ending \_\_\_\_\_, 20 \_\_\_\_\_  
**▶ Attach to Form 1118.**

OMB No. 1545-0123

Name of corporation  
 Roger Rabbit Inc.

Employer identification number  
 00-0000004

**Part I Adjustments to Separate Limitation Income or (Losses) in Determining Numerators of Limitation Fractions (see instructions)**

	(i) Section 951A income	(ii) Foreign branch income	(iii) Passive category income	(iv) General category income	(v) Other income* (identify ▶ _____)	(vi) U.S. income
<b>1</b> Income or (loss) before adjustments				-120,387,000		
<b>2</b> Allocation of separate limitation losses:						
<b>a</b> Section 951A income	( )	( )	( )	( )	( )	
<b>b</b> Foreign branch income	( )	( )	( )	( )	( )	
<b>c</b> Passive category income	( )	( )	( )	( )	( )	
<b>d</b> General category income	( )	( )	( )	120,387,000	( )	
<b>e</b> Other income* (identify ▶ _____)	( )	( )	( )	( )	( )	
<b>3 Subtotal</b> —Combine lines 1 through 2e.				0		
<b>4</b> Allocation of overall foreign losses						( )
<b>5</b> Allocation of domestic losses	( )	( )	( )	( )	( )	
<b>6 Subtotal</b> —Combine lines 3 through 5.						
<b>7</b> Recapture of overall foreign losses	( )	( )	( )	( )	( )	
<b>8 Subtotal</b> —Combine lines 6 and 7.						
<b>9</b> Recharacterization of separate limitation income:						
<b>a</b> Section 951A income	( )					
<b>b</b> Foreign branch income		( )				
<b>c</b> Passive category income			( )			
<b>d</b> General category income				( )		
<b>e</b> Other income* (identify ▶ _____)					( )	
<b>10</b> Recapture of overall domestic losses						( )
<b>11 Numerator of Limitation Fraction</b> — Combine lines 8 through 10. Enter each result here and on Schedule B, Part II, line 7, of corresponding Form 1118.				0		

\*Important: See **Computer-Generated Schedule J** in instructions.

**Tax Year 2023  
1120 MeF ATS Scenario 4**

**October 05, 2023**

**Part II Year-End Balances of Future Separate Limitation Income That Must Be Recharacterized (section 904(f)(5)(C))**

	(i) Section 951A income	(ii) Foreign branch income	(iii) Passive category income	(iv) General category income	(v) Other income* (identify ▶ _____ _____)	(vi) U.S. income
<b>a</b> Section 951A income						
<b>b</b> Foreign branch income						
<b>c</b> Passive category income						
<b>d</b> General category income						
<b>e</b> Other income* (identify ▶ _____)						

**Part III Overall Foreign Loss Account Balances (section 904(f)(1))** Complete for each separate limitation income category.

<b>1</b> Beginning balance						
<b>2</b> Current year additions						
<b>3</b> Current year reductions (other than recapture)	( )	( )	( )	( )	( )	
<b>4</b> Current year recapture (from Part I, line 7)	( )	( )	( )	( )	( )	
<b>5</b> <b>Ending balance</b> —Combine lines 1 through 4.						

**Part IV Overall Domestic Loss Account Balances (section 904(g)(1))**

<b>1</b> Beginning balance						
<b>2</b> Current year additions						
<b>3</b> Current year reductions (other than recapture)	( )	( )	( )	( )	( )	
<b>4</b> <b>Subtotal</b> —Combine lines 1 through 3.						
<b>5</b> Current year recapture (from Part I, line 10)						
<b>6</b> <b>Ending balance</b> —Subtract line 5 from line 4.						

\*Important: See **Computer-Generated Schedule J** in instructions.

October 05, 2023

Tax Year 2023
1120 MeF ATS Scenario 4

Information Return of U.S. Persons With Respect to Certain Foreign Corporations

Form 5471

(Rev. December 2023)

OMB No. 1545-0123

Attachment Sequence No. 121

Go to www.irs.gov/Form5471 for instructions and the latest information.

Department of the Treasury Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning Jan 01, 20 23, and ending Dec 31, 20 23

Name of person filing this return: Roger Rabbit Inc.
A Identifying number: 00-0000004
B Category of filer: 1a, 1b, 1c, 2, 3, 4, 5a, 5b, 5c
C Enter the total percentage of the foreign corporation's voting stock you owned at the end of its annual accounting period: 100%

D Check box if this is a final Form 5471 for the foreign corporation
E Check if any excepted specified foreign financial assets are reported on this form
F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40
G If the box on line F is checked, enter the corresponding code for "Alternative Information"

Table with 4 columns: (1) Name, (2) Address, (3) Identifying number, (4) Check applicable box(es) (Shareholder, Officer, Director)

Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated.

1a Name and address of foreign corporation: Foreign Finance Corporation, 75 Any Street, Birmingham, England 126375
b(1) Employer identification number: 00-0000045
b(2) Reference ID number: ABC1234
b(3) Previous reference ID number(s)
c Country under whose laws incorporated: UK
d Date of incorporation: 01/01/1990
e Principal place of business: UK
f Principal business activity code number: 523900
g Principal business activity: Financial Investment
h Functional currency code: GBP

2 Provide the following information for the foreign corporation's accounting period stated above.
a Name, address, and identifying number of branch office or agent (if any) in the United States: Samuel Addams, 75 Any Street, Birmingham, England 126375
b If a U.S. income tax return was filed, enter: (i) Taxable income or (loss), (ii) U.S. income tax paid (after all credits)
c Name and address of foreign corporation's statutory or resident agent in country of incorporation
d Name and address (including corporate department, if applicable) of person (or persons) with custody of the books and records of the foreign corporation

Schedule A Stock of the Foreign Corporation

Table with 3 columns: (a) Description of each class of stock, (b) Number of shares issued and outstanding (i) Beginning of annual accounting period, (ii) End of annual accounting period. Rows: Common, Preferred.



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**1120 MeF ATS Scenario 4**

Form 5471 (Rev. 12-2023)

**Schedule B Shareholders of Foreign Corporation**

**Part I U.S. Shareholders of Foreign Corporation** (see instructions)

(a) Name, address, and identifying number of shareholder	(b) Description of each class of stock held by shareholder. <b>Note:</b> This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period	(e) Pro rata share of subpart F income (enter as a percentage)
Roger Rabbit 35 Any Street, Anytown, NY 10006 00-0000004	Common	750	1,000	100
Roger Rabbit 35 Any Street, Anytown, NY 10006 00-0000004	Class B Preferred	193,710	258,280	100

**Part II Direct Shareholders of Foreign Corporation** (see instructions)

(a) Name, address, and identifying number of shareholder. Also, include country of incorporation or formation, if applicable.	(b) Description of each class of stock held by shareholder. <b>Note:</b> This description should match the corresponding description entered in Schedule A, column (a).	(c) Number of shares held at beginning of annual accounting period	(d) Number of shares held at end of annual accounting period

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Form 5471 (Rev. 12-2023)

**Schedule C Income Statement** (see instructions)

**Important:** Report all information in functional currency in accordance with U.S. generally accepted accounting principles (GAAP). Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for dollar approximate separate transactions method (DASTM) corporations.

		Functional Currency	U.S. Dollars
<b>Income</b>	<b>1a</b> Gross receipts or sales . . . . .	<b>1a</b>	
	<b>b</b> Returns and allowances . . . . .	<b>1b</b>	
	<b>c</b> Subtract line 1b from line 1a . . . . .	<b>1c</b>	
	<b>2</b> Cost of goods sold . . . . .	<b>2</b>	
	<b>3</b> Gross profit (subtract line 2 from line 1c) . . . . .	<b>3</b>	
	<b>4</b> Dividends . . . . .	<b>4</b>	
	<b>5</b> Interest . . . . .	<b>5</b>	28,862,341,000 35,294,101,000
	<b>6a</b> Gross rents . . . . .	<b>6a</b>	14,988,962,000 22,169,741,000
	<b>b</b> Gross royalties and license fees . . . . .	<b>6b</b>	
	<b>7</b> Net gain or (loss) on sale of capital assets. . . . .	<b>7</b>	
<b>8a</b> Foreign currency transaction gain or loss—unrealized . . . . .	<b>8a</b>		
<b>b</b> Foreign currency transaction gain or loss—realized . . . . .	<b>8b</b>		
<b>9</b> Other income (attach statement) . . . . .	<b>9</b>		
<b>10</b> Total income (add lines 3 through 9) . . . . .	<b>10</b>	43,851,303,000 57,463,842,000	
<b>Deductions</b>	<b>11</b> Compensation not deducted elsewhere . . . . .	<b>11</b>	
	<b>12a</b> Rents . . . . .	<b>12a</b>	2,588,175,000 3,828,095,000
	<b>b</b> Royalties and license fees . . . . .	<b>12b</b>	
	<b>13</b> Interest . . . . .	<b>13</b>	36,977,000 54,692,000
	<b>14</b> Depreciation not deducted elsewhere . . . . .	<b>14</b>	
	<b>15</b> Depletion . . . . .	<b>15</b>	
	<b>16</b> Taxes (exclude income tax expense (benefit)) . . . . .	<b>16</b>	121,000 179,000
	<b>17</b> Other deductions (attach statement—exclude income tax expense (benefit)) . . . . .	<b>17</b>	556,318,000 822,834,000
<b>18</b> Total deductions (add lines 11 through 17) . . . . .	<b>18</b>	3,181,591,000 4,705,800,000	
<b>Net Income</b>	<b>19</b> Net income or (loss) before unusual or infrequently occurring items, and income tax expense (benefit) (subtract line 18 from line 10) . . . . .	<b>19</b>	40,669,712,000 52,758,042,000
	<b>20</b> Unusual or infrequently occurring items . . . . .	<b>20</b>	(12,818,965,000) (11,564,806,000)
	<b>21a</b> Income tax expense (benefit)—current . . . . .	<b>21a</b>	
	<b>b</b> Income tax expense (benefit)—deferred . . . . .	<b>21b</b>	
<b>22</b> Current year net income or (loss) per books (combine lines 19 through 21b)	<b>22</b>	27,850,747,000 41,193,236,000	
<b>Other Comprehensive Income</b>	<b>23a</b> Foreign currency translation adjustments . . . . .	<b>23a</b>	
	<b>b</b> Other . . . . .	<b>23b</b>	
	<b>c</b> Income tax expense (benefit) related to other comprehensive income . . . . .	<b>23c</b>	
	<b>24</b> Other comprehensive income (loss), net of tax (line 23a plus line 23b less line 23c) . . . . .	<b>24</b>	

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Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

Table with columns for Assets, Liabilities and Shareholders' Equity, (a) Beginning of annual accounting period, and (b) End of annual accounting period. Rows include Cash, Trade notes and accounts receivable, Derivatives, Inventories, etc.

Schedule G Other Information

Table with columns for Yes and No. Rows include questions about foreign ownership, base erosion payments, and disallowed deductions.

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Schedule G Other Information (continued)

Table with columns 'Yes' and 'No'. Rows include questions 6a through 19a regarding foreign-derived intangible income, gross receipts, cost sharing arrangements, stock purchases, intangible property, expatriated subsidiaries, reportable transactions, foreign taxes, interest expense disallowance, and distributions/acquisitions.

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**Schedule I Summary of Shareholder's Income From Foreign Corporation** (see instructions)

If item H on page 1 is completed, a separate Schedule I must be filed for each Category 4, 5a, or 5b filer for whom reporting is furnished on this Form 5471. This Schedule I is being completed for:

Name of U.S. shareholder	Identifying number
<b>1a</b> Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	<b>1a</b> 43,668,620,000
<b>b</b> Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions)	<b>1b</b>
<b>c</b> Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	<b>1c</b>
<b>d</b> Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	<b>1d</b>
<b>e</b> Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	<b>1e</b>
<b>f</b> Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	<b>1f</b>
<b>g</b> Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A)	<b>1g</b>
<b>h</b> Other subpart F income (enter result from Worksheet A)	<b>1h</b>
<b>2</b> Earnings invested in U.S. property (enter the result from Worksheet B)	<b>2</b>
<b>3</b> Reserved for future use	<b>3</b>
<b>4</b> Factoring income	<b>4</b>
See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.	
<b>5a</b> Section 245A eligible dividends (see instructions)	<b>5a</b>
<b>b</b> Extraordinary disposition amounts (see instructions)	<b>5b</b>
<b>c</b> Extraordinary reduction amounts (see instructions)	<b>5c</b>
<b>d</b> Section 245A(e) dividends (see instructions)	<b>5d</b>
<b>e</b> Dividends not reported on line 5a, 5b, 5c, or 5d	<b>5e</b>
<b>6</b> Exchange gain or (loss) on a distribution of previously taxed earnings and profits	<b>6</b>

	Yes	No
<b>7a</b> Was any income of the foreign corporation blocked?		
<b>b</b> Did any such income become unblocked during the tax year (see section 964(b))?		
If the answer to either question is "Yes," attach an explanation.		
<b>8a</b> Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?		
<b>b</b> If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
<b>c</b> Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.		
<b>9</b> Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____		

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**SCHEDULE E**  
**(Form 5471)**  
 (Rev. December 2021)  
 Department of the Treasury  
 Internal Revenue Service

**Tax Year 2023**  
**1120 MeF ATS Scenario 4**  
**Income, War Profits, and Excess Profits Taxes Paid or Accrued**

▶ Attach to Form 5471.  
 ▶ Go to [www.irs.gov/Form5471](http://www.irs.gov/Form5471) for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 <u>Roger Rabbit Inc.</u>		Identifying number <u>00-000004</u>
Name of foreign corporation <u>Foreign Finance Corporation</u>	EIN (if any) <u>00-0000045</u>	Reference ID number (see instructions) <u>ABC1234</u>
a Separate Category (Enter code—see instructions.)		▶ <u>GEN</u>
b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)		▶ _____
c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)		▶ _____

**Part I Taxes for Which a Foreign Tax Credit Is Allowed**  
**Section 1 – Taxes Paid or Accrued Directly by Foreign Corporation**

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Unsuspected Taxes	(d) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(e) Foreign Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	(f) U.S. Tax Year of Payor Entity to Which Tax Relates (Year/Month/Day)	
1	<u>Rolling Stone Enterprises</u>		<input type="checkbox"/>	<u>UK</u>	<u>2021/01/01</u>	<u>2021/12/31</u>	
2			<input type="checkbox"/>				
3			<input type="checkbox"/>				
4			<input type="checkbox"/>				
	(g) Income Subject to Tax in the Foreign Jurisdiction (see instructions)	(h) If taxes are paid on U.S. source income, check box	(i) Local Currency in Which Tax Is Payable (enter code—see instructions)	(j) Tax Paid or Accrued (in local currency in which the tax is payable)	(k) Conversion Rate to U.S. Dollars	(l) In U.S. Dollars (divide column (j) by column (k))	(m) In Functional Currency of Foreign Corporation
1	<u>0</u>	<input type="checkbox"/>	<u>GBP</u>	<u>7,969,922</u>	<u>0.6761</u>	<u>11,788,082</u>	<u>7,969,922</u>
2		<input type="checkbox"/>					
3		<input type="checkbox"/>					
4		<input type="checkbox"/>					
5	Total (combine lines 1 through 4 of column (l)). Also report amount on Schedule E-1, line 4					<u>11,788,082</u>	
6	Total (combine lines 1 through 4 of column (m))						<u>7,969,922</u>

**Section 2 – Taxes Deemed Paid by Foreign Corporation**

	(a) Name of Lower-Tier Distributing Foreign Corporation	(b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation	(c) Country or U.S. Possession to Which Tax Is Paid (Enter code—see instructions. Use a separate line for each.)	(d) PTEP Group (enter code)	(e) Annual PTEP Account (enter year)
1					
2					
3					
4					
	(f) PTEP Distributed (enter amount in functional currency)	(g) Total Amount of PTEP in the PTEP Group (in functional currency)	(h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD)	(i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD)	
1					
2					
3					
4					
5	Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6				

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Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation <u>Foreign Finance Corporation</u>	EIN (if any) <u>00-0000045</u>	Reference ID number (see instructions) <u>ABC1234</u>
<b>a</b> Separate Category (Enter code—see instructions.) . . . . . <span style="float:right">▶</span> <u>GEN</u>		
<b>b</b> If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . <span style="float:right">▶</span> _____		
<b>c</b> If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . <span style="float:right">▶</span> _____		

**Part II Election**

For tax years beginning after December 31, 2004, has an election been made under section 986(a)(1)(D) to translate taxes using the exchange rate on the date of payment?  
 Yes     No    If "Yes," state date of election ▶ \_\_\_\_\_

**Part III Taxes for Which a Foreign Tax Credit Is Disallowed** (Enter in functional currency of foreign corporation.)

	(a) Name of Payor Entity	(b) EIN or Reference ID Number of Payor Entity	(c) Section 901(j)	(d) Section 901(k) and (l)	(e) Section 901(m)	(f) U.S. Taxes	(g) Suspended Taxes	(h) Other	(i) Total
<b>1</b>									
<b>2</b>									
<b>3</b>	In functional currency (combine lines 1 and 2) . . . . . <span style="float:right">▶</span>								
<b>4</b>	In U.S. dollars (translated at the average exchange rate, as defined in section 989(b)(3) and related regulations (see instructions)) . . . . . <span style="float:right">▶</span>								

**Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Earnings and Profits (E&P) of Foreign Corporation**

**IMPORTANT:** Enter amounts in U.S. dollars.

		Taxes related to:			
		(a) Subpart F Income	(b) Tested Income	(c) Residual Income	(d) Suspended Taxes
<b>1a</b>	Balance at beginning of year (as reported in prior year Schedule E-1) . . . . .	-0-	-0-	-0-	
<b>b</b>	Beginning balance adjustments (attach statement) . . . . .				
<b>c</b>	Adjusted beginning balance (combine lines 1a and 1b) . . . . .				
<b>2</b>	Adjustment for foreign tax redetermination . . . . .				
<b>3a</b>	Taxes unsuspending under anti-splitter rules . . . . .				
<b>b</b>	Taxes suspended under anti-splitter rules . . . . .				
<b>4</b>	Taxes reported on Schedule E, Part I, Section 1, line 5, column (l) . . . . .	11,788,082			
<b>5</b>	Taxes carried over in nonrecognition transactions . . . . .				
<b>6</b>	Taxes reported on Schedule E, Part I, Section 2, line 5, column (i) . . . . .				
<b>7</b>	Other adjustments (attach statement) . . . . .				
<b>8</b>	Taxes paid or accrued on current income/E&P or accumulated E&P (combine lines 1c through 7) . . . . .	11,788,082			
<b>9</b>	Taxes deemed paid with respect to inclusions (see instructions) . . . . .	-11,788,082			
<b>10</b>	Taxes deemed paid with respect to actual distributions . . . . .				
<b>11</b>	Taxes on amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P . . . . .				
<b>12</b>	Other (attach statement) . . . . .				
<b>13</b>	Balance of taxes paid or accrued (combine lines 8 through 12 in columns (a), (b), and (c))				
<b>14</b>	Reserved for future use . . . . .				
<b>15</b>	Reduction for other taxes not deemed paid . . . . .				
<b>16</b>	Balance of taxes paid or accrued at the beginning of the next year. Line 16, columns (a), (b), and (c) must always equal zero. So, if necessary, enter negative amounts on line 15 of columns (a), (b), and (c) in amounts sufficient to reduce line 13, columns (a), (b), and (c) to zero. For the remaining columns, combine lines 8 through 12 . . . . .	-0-	-0-	-0-	

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1120 MeF ATS Scenario 4**

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Schedule E (Form 5471) (Rev. 12-2021)

Name of foreign corporation <b>Foreign Finance Corporation</b>	EIN (if any) <b>00-0000045</b>	Reference ID number (see instructions) <b>ABC1234</b>
<b>a</b> Separate Category (Enter code—see instructions.) . . . . . ▶ <u>          GEN          </u>		
<b>b</b> If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶ _____		
<b>c</b> If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) . . . . . ▶ _____		

**Schedule E-1 Taxes Paid, Accrued, or Deemed Paid on Accumulated Earnings and Profits (E&P) of Foreign Corporation (continued)**

(e) Taxes related to previously taxed E&P (see instructions)										
	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
<b>1a</b>										
<b>b</b>										
<b>c</b>										
<b>2</b>										
<b>3a</b>										
<b>b</b>										
<b>4</b>										
<b>5</b>										
<b>6</b>										
<b>7</b>										
<b>8</b>										
<b>9</b>										
<b>10</b>										
<b>11</b>										
<b>12</b>										
<b>13</b>										
<b>14</b>										
<b>15</b>										
<b>16</b>										



**Tax Year 2023**  
**1120 MeF ATS Scenario 4**  
**Current Earnings and Profits**

▶ Attach to Form 5471.

OMB No. 1545-0123

▶ Go to [www.irs.gov/Form5471](http://www.irs.gov/Form5471) for instructions and the latest information.

Name of person filing Form 5471 <u>Roger Rabbit Inc.</u>		Identifying number <u>00-0000004</u>
Name of foreign corporation <u>Foreign Finance Corporation</u>	EIN (if any) <u>00-0000045</u>	Reference ID number (see instructions) <u>ABC1234</u>

**IMPORTANT:** Enter the amounts on lines 1 through 5c in **functional** currency.

<b>1</b>	Current year net income or (loss) per foreign books of account . . . . .			<b>1</b>	<u>27,850,747,000</u>
<b>2</b>	Net adjustments made to line 1 to determine current earnings and profits according to U.S. financial and tax accounting standards (see instructions):	Net Additions	Net Subtractions		
<b>a</b>	Capital gains or losses . . . . .	<b>2a</b>			
<b>b</b>	Depreciation and amortization . . . . .	<b>2b</b>			
<b>c</b>	Depletion . . . . .	<b>2c</b>			
<b>d</b>	Investment or incentive allowance . . . . .	<b>2d</b>	<u>355,647,000</u>		
<b>e</b>	Charges to statutory reserves . . . . .	<b>2e</b>			
<b>f</b>	Inventory adjustments . . . . .	<b>2f</b>			
<b>g</b>	Income taxes (see Schedule E, Part I, Section 1, line 6, column (m), and Part III, line 3, column (i)) . . . . .	<b>2g</b>		<u>113,140,000</u>	
<b>h</b>	Foreign currency gains or losses . . . . .	<b>2h</b>			
<b>i</b>	Other (attach statement) . . . . .	<b>2i</b>	<u>1,946,284,000</u>	<u>515,184,000</u>	
<b>3</b>	Total net additions . . . . .	<b>3</b>	<u>2,301,931,000</u>		
<b>4</b>	Total net subtractions . . . . .	<b>4</b>		<u>628,324,000</u>	
<b>5a</b>	Current earnings and profits (line 1 plus line 3 minus line 4) . . . . .			<b>5a</b>	<u>29,524,354,000</u>
<b>b</b>	DASTM gain or (loss) for foreign corporations that use DASTM (see instructions) . . . . .			<b>5b</b>	
<b>c</b>	Combine lines 5a and 5b and enter the result on line 5c. Then enter on lines 5c(i), 5c(ii), and 5c(iii)(A) through 5c(iii)(D) the portion of the line 5c amount with respect to the categories of income shown on those lines . . . . .			<b>5c</b>	<u>29,524,354,000</u>
	(i) General category (enter amount on applicable Schedule J, Part I, line 3, column (a)) . . . . .	<b>5c(i)</b>			
	(ii) Passive category (enter amount on applicable Schedule J, Part I, line 3, column (a)) . . . . .	<b>5c(ii)</b>			
	(iii) Section 901(j) category:				
	(A) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(A) and on the applicable Schedule J, Part I, line 3, column (a) . . . . .	<b>5c(iii)(A)</b>			
	(B) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(B) and on the applicable Schedule J, Part I, line 3, column (a) . . . . .	<b>5c(iii)(B)</b>			
	(C) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(C) and on the applicable Schedule J, Part I, line 3, column (a) . . . . .	<b>5c(iii)(C)</b>			
	(D) Enter the country code of the sanctioned country ▶ _____ and enter the line 5c amount with respect to the sanctioned country on this line 5c(iii)(D) and on the applicable Schedule J, Part I, line 3, column (a) . . . . .	<b>5c(iii)(D)</b>			
<b>d</b>	Current earnings and profits in U.S. dollars (line 5c translated at the average exchange rate, as defined in section 989(b)(3) and the related regulations (see instructions)) . . . . .			<b>5d</b>	<u>43,668,620,000</u>
<b>e</b>	Enter exchange rate used for line 5d . . . . . ▶				<u>0.6761</u>

**October 05, 2023**  
**SCHEDULE J**  
**(Form 5471)**

(Rev. December 2020)  
 Department of the Treasury  
 Internal Revenue Service

**Tax Year 2023**  
**1120 MeF ATS Scenario 4**  
**Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation**

▶ Attach to Form 5471.

▶ Go to [www.irs.gov/Form5471](http://www.irs.gov/Form5471) for instructions and the latest information.

OMB No. 1545-0123

Name of person filing Form 5471 <b>Roger Rabbit Inc.</b>		Identifying number <b>00-0000004</b>
Name of foreign corporation <b>Foreign Finance Corporation</b>	EIN (if any) <b>00-0000045</b>	Reference ID number (see instructions) <b>ABC1234</b>
a Separate Category (Enter code—see instructions.) . . . . . ▶ b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) . . . . . ▶		<b>GEN</b>

**Part I Accumulated E&P of Controlled Foreign Corporation**

Check the box if person filing return does not have all U.S. shareholders' information to complete an amount in column (e) (see instructions).

Important: Enter amounts in functional currency.		(a) Post-2017 E&P Not Previously Taxed (post-2017 section 959(c)(3) balance)	(b) Post-1986 Undistributed Earnings (post-1986 and pre-2018 section 959(c)(3) balance)	(c) Pre-1987 E&P Not Previously Taxed (pre-1987 section 959(c)(3) balance)	(d) Hovering Deficit and Deduction for Suspended Taxes	(e) Previously Taxed E&P (see instructions)	
						(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP
<b>1a</b>	Balance at beginning of year (as reported on prior year Schedule J) . . . . .			69,100,775,000			
<b>b</b>	Beginning balance adjustments (attach statement)						
<b>c</b>	Adjusted beginning balance (combine lines 1a and 1b)			69,100,775,000			
<b>2a</b>	Reduction for taxes unsuspended under anti-splitter rules						
<b>b</b>	Disallowed deduction for taxes suspended under anti-splitter rules . . . . .						
<b>3</b>	Current year E&P (or deficit in E&P) (enter amount from applicable line 5c of Schedule H) . . . . .	29,524,354,000					
<b>4</b>	E&P attributable to distributions of previously taxed E&P from lower-tier foreign corporation . . . . .						
<b>5a</b>	E&P carried over in nonrecognition transaction . . . . .						
<b>b</b>	Reclassify deficit in E&P as hovering deficit after nonrecognition transaction . . . . .						
<b>6</b>	Other adjustments (attach statement) . . . . .						
<b>7</b>	Total current and accumulated E&P (combine lines 1c through 6) . . . . .	29,524,354,000		69,100,775,000			
<b>8</b>	Amounts reclassified to section 959(c)(2) E&P from section 959(c)(3) E&P . . . . .	-29,524,354,000					
<b>9</b>	Actual distributions . . . . .						
<b>10</b>	Amounts reclassified to section 959(c)(1) E&P from section 959(c)(2) E&P . . . . .						
<b>11</b>	Amounts included as earnings invested in U.S. property and reclassified to section 959(c)(1) E&P (see instructions)						
<b>12</b>	Other adjustments (attach statement) . . . . .						
<b>13</b>	Hovering deficit offset of undistributed post-transaction E&P (see instructions) . . . . .						
<b>14</b>	Balance at beginning of next year (combine lines 7 through 13)	0		69,100,775,000			

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Schedule J (Form 5471) (Rev. 12-2020)

Page **2**

<b>Part I Accumulated E&amp;P of Controlled Foreign Corporation</b> <i>(continued)</i>					
(e) Previously Taxed E&P (see instructions)					
	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(a) PTEP	(vii) Section 965(b) PTEP
1a					
b					
c					
2a					
b					
3					
4					
5a					
b					
6					
7					
8	29,524,354,000				
9					
10					
11					
12					
13					
14	29,524,354,000				
(e) Previously Taxed E&P (see instructions)					(f)
	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP	Total Section 964(a) E&P (combine columns (a), (b), (c), and (e)(i) through (e)(x))	
1a				69,100,775,000	
b					
c				69,100,775,000	
2a					
b					
3				29,524,354,000	
4					
5a					
b					
6					
7				98,625,129,000	
8					
9					
10					
11					
12					
13					
14				98,625,129,000	

**Part II** Nonpreviously Taxed E&P Subject to Recapture as Subpart F Income (section 952(c)(2))

**Important:** Enter amounts in functional currency.

1	Balance at beginning of year . . . . .	▶	1	
2	Additions (amounts subject to future recapture) . . . . .	▶	2	
3	Subtractions (amounts recaptured in current year) . . . . .	▶	3	
4	Balance at end of year (combine lines 1 through 3) . . . . .	▶	4	

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SCHEDULE M
(Form 5471)

Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons

OMB No. 1545-0123

(Rev. December 2021)

Department of the Treasury
Internal Revenue Service

Attach to Form 5471.

Go to www.irs.gov/Form5471 for instructions and the latest information.

Table with 2 main columns: Name of person filing Form 5471 (Roger Rabbit Inc., Foreign Finance Corporation) and Identifying number (00-000004, ABC1234).

Important: Complete a separate Schedule M for each controlled foreign corporation. Enter the totals for each type of transaction that occurred during the annual accounting period between the foreign corporation and the persons listed in columns (b) through (f). All amounts must be stated in U.S. dollars translated from functional currency at the average exchange rate for the foreign corporation's tax year. See instructions.

Enter the relevant functional currency and the exchange rate used throughout this schedule British Pound .6761

Main table with 6 columns: (a) Transactions of foreign corporation, (b) U.S. person filing this return, (c) Any domestic corporation or partnership controlled by U.S. person filing this return, (d) Any other foreign corporation or partnership controlled by U.S. person filing this return, (e) 10% or more U.S. shareholder of controlled foreign corporation, (f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation. Rows 1-30 list various transaction types like sales, purchases, and compensation.

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Schedule M (Form 5471) (Rev. 12-2021)

Name of person filing Form 5471

Identifying number

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
<b>31</b> Accounts Payable . . . . .					
<b>32</b> Amounts borrowed (enter the maximum loan balance during the year)—see instructions					
<b>33</b> Accounts Receivable . . . . .					
<b>34</b> Amounts loaned (enter the maximum loan balance during the year)—see instructions	46,001,741,000				

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Tax Year 2023
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SCHEDULE O
(Form 5471)

Organization or Reorganization of Foreign Corporation, and Acquisitions and Dispositions of its Stock

OMB No. 1545-0704

(Rev. December 2012)
Department of the Treasury
Internal Revenue Service

Information about Schedule O (Form 5471) and its instructions is at www.irs.gov/form5471
Attach to Form 5471.

Table with 2 main columns: Name of person filing Form 5471 and Identifying number. Sub-rows include Roger Rabbit Inc. and Foreign Finance Corporation with their respective EINs and Reference ID numbers.

Important: Complete a separate Schedule O for each foreign corporation for which information must be reported.

Part I To Be Completed by U.S. Officers and Directors

Table with 5 columns: (a) Name of shareholder, (b) Address of shareholder, (c) Identifying number of shareholder, (d) Date of original 10% acquisition, (e) Date of additional 10% acquisition. Includes entry for Roger Rabbit Inc.

Part II To Be Completed by U.S. Shareholders

Note: If this return is required because one or more shareholders became U.S. persons, attach a list showing the names of such persons and the date each became a U.S. person.

Section A—General Shareholder Information

Table with 4 main columns: (a) Name, address, and identifying number of shareholder(s), (b) For shareholder's latest U.S. income tax return filed, indicate: (1) Type of return, (2) Date return filed, (3) Internal Revenue Service Center where filed, (c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation. Includes entry for Roger Rabbit Inc.

Section B—U.S. Persons Who Are Officers or Directors of the Foreign Corporation

Table with 4 main columns: (a) Name of U.S. officer or director, (b) Address, (c) Social security number, (d) Check appropriate box(es) for Officer or Director.

Section C—Acquisition of Stock

Table with 6 columns: (a) Name of shareholder(s) filing this schedule, (b) Class of stock acquired, (c) Date of acquisition, (d) Method of acquisition, (e) Number of shares acquired (1) Directly, (2) Indirectly, (3) Constructively. Includes entries for Roger Rabbit Inc. for Common and Preferred stock.

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**October 05, 2023**

Schedule O (Form 5471) (Rev. 12-2012)

Page **2**

(f) Amount paid or value given	(g) Name and address of person from whom shares were acquired
9,000,000,000	Mary Doe, 812 Maple Street, Somewhere, MD 20901

**Section D—Disposition of Stock**

(a) Name of shareholder disposing of stock	(b) Class of stock	(c) Date of disposition	(d) Method of disposition	(e) Number of shares disposed of		
				(1) Directly	(2) Indirectly	(3) Constructively

(f) Amount received	(g) Name and address of person to whom disposition of stock was made

**Section E—Organization or Reorganization of Foreign Corporation**

(a) Name and address of transferor	(b) Identifying number (if any)	(c) Date of transfer

(d) Assets transferred to foreign corporation			(e) Description of assets transferred by, or notes or securities issued by, foreign corporation
(1) Description of assets	(2) Fair market value	(3) Adjusted basis (if transferor was U.S. person)	

**Section F—Additional Information**

**(a)** If the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the consolidated return), the taxable income or loss, and the U.S. income tax paid (after all credits).

**(b)** List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock ►

**(c)** If the foreign corporation is a member of a group constituting a chain of ownership, attach a chart, for each unit of which a shareholder owns 10% or more in value or voting power of the outstanding stock. The chart must indicate the corporation's position in the chain of ownership and the percentages of stock ownership (see instructions for an example).

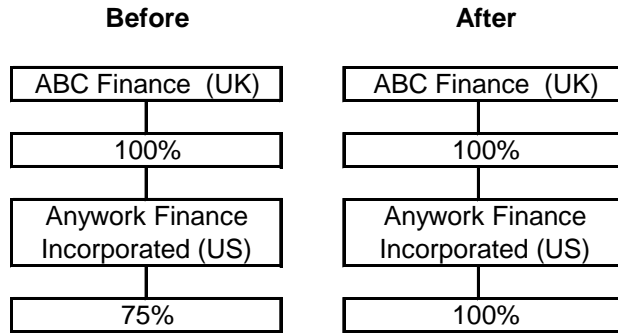


October 05, 2023

**Tax Year 2023**  
**1120 MeF ATS Scenario 4**

**Form 1120 Test Scenario 4**

**Roger Rabbit Inc. 00-0000004**  
**F5471, Schedule O, Section F ( C )**  
**Additional Information, Organizational Chart**



October 05, 2023

1120 MeF ATS Scenario 4

Form 5472

Information Return of a 25% Foreign-Owned U.S. Corporation or a Foreign Corporation Engaged in a U.S. Trade or Business (Under Sections 6038A and 6038C of the Internal Revenue Code)

(Rev. December 2023)

OMB No. 1545-0123

Go to www.irs.gov/Form5472 for instructions and the latest information.

Department of the Treasury Internal Revenue Service

For tax year of the reporting corporation beginning Jan 01, 23, and ending Dec 31, 23

Note: Enter all information in English and money items in U.S. dollars.

Part I Reporting Corporation (see instructions). All reporting corporations must complete Part I.

1a Name of reporting corporation: Roger Rabbit Inc. 1b Employer identification number: 00-0000004 1c Total assets: \$ 250,306,361,000 1d Principal business activity 1e Principal business activity code: 522293 1f Total value of gross payments made or received reported on this Form 5472: \$ 5,000,000 1g Total number of Forms 5472 filed for the tax year: 1 1h Total value of gross payments made or received reported on all Forms 5472: \$ 5,000,000 1i Check here if this is a consolidated filing of Form 5472: [ ] 1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472: [x] 1k Total number of Parts VIII attached to Form 5472: 1 1l Country of incorporation: US 1m Date of incorporation 1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident: US 1o Principal country(ies) where business is conducted: US 2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation: [x] 3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A: [ ]

Part II 25% Foreign Shareholder (see instructions)

Check here if any direct (or ultimate indirect) 25% foreign shareholder listed in Part II is a surrogate foreign corporation under section 7874(a)(2)(B): [ ]

4a Name and address of direct 25% foreign shareholder: ABC Finance Corporation 13 Somewhere Birmingham, UK 126375 4b(1) U.S. identifying number, if any: 00-0000021 4b(2) Reference ID number (see instructions) 4b(3) Foreign taxpayer identification number (FTIN), if any (see instructions) 4c Principal country(ies) where business is conducted: UK 4d Country of citizenship, organization, or incorporation: UK 4e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident: UK 5a Name and address of direct 25% foreign shareholder 5b(1) U.S. identifying number, if any 5b(2) Reference ID number (see instructions) 5b(3) FTIN, if any (see instructions) 5c Principal country(ies) where business is conducted 5d Country of citizenship, organization, or incorporation 5e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident 6a Name and address of ultimate indirect 25% foreign shareholder 6b(1) U.S. identifying number, if any 6b(2) Reference ID number (see instructions) 6b(3) FTIN, if any (see instructions) 6c Principal country(ies) where business is conducted 6d Country of citizenship, organization, or incorporation 6e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident 7a Name and address of ultimate indirect 25% foreign shareholder 7b(1) U.S. identifying number, if any 7b(2) Reference ID number (see instructions) 7b(3) FTIN, if any (see instructions) 7c Principal country(ies) where business is conducted 7d Country of citizenship, organization, or incorporation 7e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

Part III Related Party (see instructions). All reporting corporations must complete this question and the rest of Part III. Check applicable box: Is the related party a [X] foreign person or [ ] U.S. person?

8a Name and address of related party

ABC Finance 13 Somewhere Birmingham, UK 126375

8b(1) U.S. identifying number, if any 00-0000021 8b(2) Reference ID number (see instructions) 8b(3) FTIN, if any (see instructions)

8c Principal business activity International Finance 8d Principal business activity code 522293

8e Relationship—Check boxes that apply: [ ] Related to reporting corporation [ ] Related to 25% foreign shareholder [X] 25% foreign shareholder

8f Principal country(ies) where business is conducted UK 8g Country(ies) under whose laws the related party files an income tax return as a resident UK

Part IV Monetary Transactions Between Reporting Corporations and Foreign Related Party (see instructions)

Caution: Part IV must be completed if the "foreign person" box is checked in the heading for Part III. If estimates are used, check here. [ ]

Table with 36 rows and 2 columns. Rows include: 9 Sales of stock in trade, 10 Sales of tangible property, 11 Platform contribution transaction payments received, 12 Cost sharing transaction payments received, 13a Rents received, b Royalties received, 14 Sales, leases, licenses, etc., of intangible property rights, 15 Consideration received for technical, managerial, engineering, construction, scientific, or like services, 16 Commissions received, 17 Amounts borrowed (beginning/ending balance), 18 Interest received, 19 Premiums received for insurance or reinsurance, 20 Loan guarantee fees received, 21 Other amounts received, 22 Total (lines 9-21), 23 Purchases of stock in trade, 24 Purchases of tangible property, 25 Platform contribution transaction payments paid, 26 Cost sharing transaction payments paid, 27a Rents paid, b Royalties paid, 28 Purchases, leases, licenses, etc., of intangible property rights, 29 Consideration paid for technical, managerial, engineering, construction, scientific, or like services, 30 Commissions paid, 31 Amounts loaned (beginning/ending balance 5,000,000), 32 Interest paid, 33 Premiums paid for insurance or reinsurance, 34 Loan guarantee fees paid, 35 Other amounts paid, 36 Total (lines 23-35) 5,000,000.

Part V Reportable Transactions of a Reporting Corporation That Is a Foreign-Owned U.S. DE (see instructions)

Describe on an attached separate sheet any other transaction as defined by Regulations section 1.482-1(i)(7), such as amounts paid or received in connection with the formation, dissolution, acquisition, and disposition of the entity, including contributions to and distributions from the entity, and check here. [ ]

Part VI Nonmonetary and Less-Than-Full Consideration Transactions Between the Reporting Corporation and the Foreign Related Party (see instructions)

Describe these transactions on an attached separate sheet and check here. [ ]

Part VII Additional Information. All reporting corporations must complete Part VII.

- 37 Does the reporting corporation import goods from a foreign related party?
38a If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods?
b If "Yes," attach a statement explaining the reason or reasons for such difference.
c If the answers to questions 37 and 38a are "Yes," were the documents used to support this treatment of the imported goods in existence and available in the United States at the time of filing Form 5472?
39 During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)?
40a During the tax year, did the reporting corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A?
b If "Yes," enter the total amount of the disallowed deductions
41a Is the reporting corporation claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation?
b Enter the amount of gross receipts derived from all sales of general property to the foreign related party that the reporting corporation included in its computation of foreign-derived deduction eligible income (FDDEI).
c Enter the amount of gross receipts derived from all sales of intangible property to the foreign related party that the reporting corporation included in its computation of FDDEI.
d Enter the amount of gross receipts derived from all services provided to the foreign related party that the reporting corporation included in its computation of FDDEI.
42a Did the reporting corporation have any loan to or from the related party, to which the safe-haven rate rules of Regulations section 1.482-2(a)(iii)(B) are applicable?
b Did the reporting corporation have any loan to or from the related party for which the reporting corporation used a rate of interest within the safe-haven range of Regulations section 1.482-2(a)(2)(iii)(B)(1) (100% to 130% of the applicable Federal rate (AFR) for the relevant term)?
43a Did the reporting corporation make at least one distribution or acquisition (as defined by Regulations section 1.385-3) during the tax year, or, during the period beginning 36 months before the date of the respective acquisition or distribution and ending 36 months afterward, did the reporting corporation issue or refinance indebtedness owed to a related party?
b If the answer to question 43a is "Yes," provide the following.
(1) The amount of such distribution(s) and acquisition(s)
(2) The amount of such related party indebtedness

Part VIII Cost Sharing Arrangement (CSA)

Note: Complete a separate Part VIII for each CSA in which the reporting corporation was a participant during the tax year. Report all amounts in U.S. dollars. (See instructions.)

- 44 Provide a brief description of the CSA with respect to which this Part VIII is being completed.
None
45 During the course of the tax year, did the reporting corporation become a participant in the CSA?
46 Was the CSA in effect before January 5, 2009?
47 What was the reporting corporation's share of reasonably anticipated benefits for the CSA?
48a Enter the total amount of stock-based compensation deductions claimed by the reporting corporation
b Enter the total amount of deductions for the tax year for stock-based compensation that was granted during the term of the CSA and, at date of grant, is directly identified with, or reasonably allocable to, the intangible development activity under the CSA
c Was there any stock-based compensation granted during the term of the CSA to individuals who performed functions in business activities that generate cost shared intangibles that was not treated as directly identified with, or reasonably allocable to, the intangible development activity?
49a Enter the total amount of intangible development costs for the CSA
b Enter the amount of intangible development costs allocable to the reporting corporation based on the reporting corporation's reasonably anticipated benefits share

Part IX Base Erosion Payments and Base Erosion Tax Benefits Under Section 59A (see instructions)

- 50 Amounts defined as base erosion payments under section 59A(d)
51 Amount of base erosion tax benefits under section 59A(c)(2)
52 Amount of total qualified derivative payments as described in section 59A(h) made by the reporting corporation
53 Reserved for future use

October 05, 2023

Form **8832**

(Rev. December 2013)

### Entity Classification Election

OMB No. 1545-1516

Department of the Treasury  
Internal Revenue Service

► Information about Form 8832 and its instructions is at [www.irs.gov/form8832](http://www.irs.gov/form8832).

<b>Type or Print</b>	Name of eligible entity making election <u>DEF International Finance</u>	Employer identification number <u>00-000017</u>
	Number, street, and room or suite no. If a P.O. box, see instructions. <u>1000 Helmstraat</u>	
	City or town, state, and ZIP code. If a foreign address, enter city, province or state, postal code and country. Follow the country's practice for entering the postal code. <u>Maastricht, Limburg Netherlands 6211TA</u>	

- Check if:  Address change     Late classification relief sought under Revenue Procedure 2009-41  
 Relief for a late change of entity classification election sought under Revenue Procedure 2010-32

### Part I Election Information

**1 Type of election** (see instructions):

- a**  Initial classification by a newly-formed entity. Skip lines 2a and 2b and go to line 3.
- b**  Change in current classification. Go to line 2a.

**2a** Has the eligible entity previously filed an entity election that had an effective date within the last 60 months?

- Yes.** Go to line 2b.
- No.** Skip line 2b and go to line 3.

**2b** Was the eligible entity's prior election an initial classification election by a newly formed entity that was effective on the date of formation?

- Yes.** Go to line 3.
- No.** Stop here. You generally are not currently eligible to make the election (see instructions).

**3** Does the eligible entity have more than one owner?

- Yes.** You can elect to be classified as a partnership or an association taxable as a corporation. Skip line 4 and go to line 5.
- No.** You can elect to be classified as an association taxable as a corporation or to be disregarded as a separate entity. Go to line 4.

**4** If the eligible entity has only one owner, provide the following information:

- a** Name of owner ► Roger Rabbit Inc.
- b** Identifying number of owner ► 00-000004

**5** If the eligible entity is owned by one or more affiliated corporations that file a consolidated return, provide the name and employer identification number of the parent corporation:

- a** Name of parent corporation ► \_\_\_\_\_
- b** Employer identification number ► \_\_\_\_\_

Part I Election Information (Continued)

6 Type of entity (see instructions):

- a A domestic eligible entity electing to be classified as an association taxable as a corporation.
b A domestic eligible entity electing to be classified as a partnership.
c A domestic eligible entity with a single owner electing to be disregarded as a separate entity.
d A foreign eligible entity electing to be classified as an association taxable as a corporation.
e A foreign eligible entity electing to be classified as a partnership.
f A foreign eligible entity with a single owner electing to be disregarded as a separate entity.

7 If the eligible entity is created or organized in a foreign jurisdiction, provide the foreign country of organization Netherlands

8 Election is to be effective beginning (month, day, year) (see instructions) 12/31/2023

9 Name and title of contact person whom the IRS may call for more information SAM BROWN, TAX ADMINISTRATOR
10 Contact person's telephone number 515-555-5550

Consent Statement and Signature(s) (see instructions)

Under penalties of perjury, I (we) declare that I (we) consent to the election of the above-named entity to be classified as indicated above, and that I (we) have examined this election and consent statement, and to the best of my (our) knowledge and belief, this election and consent statement are true, correct, and complete. If I am an officer, manager, or member signing for the entity, I further declare under penalties of perjury that I am authorized to make the election on its behalf.

Table with 3 columns: Signature(s), Date, Title. Multiple empty rows for signature entry.



October 05, 2023

Tax Year 2023
1120 MeF ATS Scenario 4

Form 8858

Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs)

OMB No. 1545-1910

(Rev. September 2021)

Go to www.irs.gov/Form8858 for instructions and the latest information.

Department of the Treasury Internal Revenue Service

Information furnished for the FDE's or FB's annual accounting period (see instructions) beginning , 20 , and ending , 20

Attachment Sequence No. 140

Name of person filing this return

Roger Rabbit Inc.

Filer's identifying number

00-0000004

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

35 Any Street

City or town, state, and ZIP code

Anytown, NY 10006

Filer's tax year beginning , 20 , and ending , 20

Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated.

Check here [X] FDE of a U.S. person [ ] FDE of a controlled foreign corporation (CFC) [ ] FDE of a controlled foreign partnership [ ] FB of a U.S. person [ ] FB of a CFC [ ] FB of a controlled foreign partnership

Check here [ ] Initial Form 8858 [ ] Final Form 8858

1a Name and address of FDE or FB

DEF International Finance
1000 Helmstraat
Maastricht, Limburg/Netherlands, 6211TA

b(1) U.S. identifying number, if any

00-0000017

b(2) Reference ID number (see instructions)

c For FDE, country(ies) under whose laws organized and entity type under local tax law

Netherlands Foreign Entity

d Date(s) of organization

12/31/2018

e Effective date as FDE

03/31/2019

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number

g Country in which principal business activity is conducted

h Principal business activity

i Functional currency

2 Provide the following information for the FDE's or FB's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States

b Name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the FDE or FB, and the location of such books and records, if different

3 For the tax owner of the FDE or FB (if different from the filer), provide the following (see instructions):

a Name and address

ABCDEF Finance Corporation
14 Somewhere
Birmingham, England 126375

b Annual accounting period covered by the return (see instructions)

c(1) U.S. identifying number, if any

00-0000022

c(2) Reference ID number (see instructions)

d Country under whose laws organized

e Functional currency

4 For the direct owner of the FDE or FB (if different from the tax owner), provide the following (see instructions):

a Name and address

b Country under whose laws organized

c U.S. identifying number, if any

d Functional currency

5 Attach an organizational chart that identifies the name, placement, percentage of ownership, tax classification, and country of organization of all entities in the chain of ownership between the tax owner and the FDE or FB, and the chain of ownership between the FDE or FB and each entity in which the FDE or FB has a 10% or more direct or indirect interest. See instructions.



**Schedule C Income Statement** (see instructions)

**Important:** Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use U.S. dollar approximate separate transactions method of accounting (DASTM). If you are using the average exchange rate (determined under section 989(b)), check the following box

	Functional Currency	U.S. Dollars
1	1	
2	2	
3	3	
4	4	
5	5	
6	6	
7	7	
8	8	
9	9	
10	10	
11	11	
12	12	
13	13	
14	14	

**Schedule C-1 Section 987 Gain or Loss Information**

**Note:** See the instructions if there are multiple recipients of remittances from the FDE or FB.

	(a) Amount stated in functional currency of FDE or FB	(b) Amount stated in functional currency of recipient	
		Yes	No
1	1		
2	2		
3	3		
4			✓
5			✓

**Schedule F Balance Sheet**

**Important:** Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	1		
2	2		
3	3		
<b>Liabilities and Owner's Equity</b>			
4	4		
5	5		
6	6		

**Schedule G Other Information**

	Yes	No
1		✓
2		✓
3		
4		✓
5		✓

Schedule G Other Information (continued)

Table with 3 columns: Question, Yes, No. Rows include questions 6, 7a, 7b, 7c, 8a, 8b, 8c, 9, 10a, 10b, 11a, 11b, 11c, 12a, 12b, 12c, 12d, 12e, 12f, 12g, 12h, 12i, 12j, 12k, 12l, 12m, 12n, 12o, 12p, 12q, 12r, 12s, 12t, 12u, 12v, 12w, 12x, 12y, 12z, 13a, 13b.

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: Enter the amounts on lines 1 through 6 in functional currency.

Table with 3 columns: Description, Line Number, Amount. Rows include: 1 Current year net income (loss) per foreign books of account, 2 Total net additions, 3 Total net subtractions, 4 Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3), 5 DASTM gain (loss) (if applicable), 6 Combine lines 4 and 5, 7 Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average exchange rate determined under section 989(b) and the related regulations (see instructions)), 8 Enter exchange rate used for line 7.

**Schedule I Transferred Loss Amount** (see instructions)

**Important:** See instructions for who has to complete this section.

		Yes	No
1	Were any assets of an FB (including an FB that is an FDE) transferred to a foreign corporation? If "No," stop here. If "Yes," go to line 2 . . . . .		✓
2	Was the transferor a domestic corporation that transferred substantially all of the assets of an FB (including an FB that is an FDE) to a specified 10%-owned foreign corporation? If "No," stop here. If "Yes," go to line 3 . . . . .		
3	Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? If "No," stop here. If "Yes," go to line 4 . . . . .		
4	Enter the transferred loss amount included in gross income as required under section 91. See instructions . . . . .	<b>4</b>	

**Schedule J Income Taxes Paid or Accrued** (see instructions)

(a) Country or Possession	Foreign Income Taxes				Foreign Tax Credit Separate Categories			
	(b) Foreign Tax Year (YYYY-MM-DD)	(c) Foreign Currency	(d) Conversion Rate	(e) U.S. Dollars	(f) Foreign Branch	(g) Passive	(h) General	(i) Other
<b>Totals</b>								

Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs)

(Rev. September 2021)

Go to www.irs.gov/Form8858 for instructions and the latest information.

Department of the Treasury Internal Revenue Service

Information furnished for the FDE's or FB's annual accounting period (see instructions) beginning , 20 , and ending , 20

Attachment Sequence No. 140

Name of person filing this return

Roger Rabbit Inc.

Filer's identifying number

00-0000004

Number, street, and room or suite no. (or P.O. box number if mail is not delivered to street address)

35 Any Street

City or town, state, and ZIP code

Anytown, NY 10006

Filer's tax year beginning , 20 , and ending , 20

Important: Fill in all applicable lines and schedules. All information must be in English. All amounts must be stated in U.S. dollars unless otherwise indicated.

Check here [X] FDE of a U.S. person [ ] FDE of a controlled foreign corporation (CFC) [ ] FDE of a controlled foreign partnership [ ] FB of a U.S. person [ ] FB of a CFC [ ] FB of a controlled foreign partnership

Check here [ ] Initial Form 8858 [ ] Final Form 8858

1a Name and address of FDE or FB

Bugs Bunny Inc. 36 Anywhere Ave. Port Vila, Vanuatu

b(1) U.S. identifying number, if any

00-0000012

b(2) Reference ID number (see instructions)

c For FDE, country(ies) under whose laws organized and entity type under local tax law

d Date(s) of organization

e Effective date as FDE

Vanuatu Corporation Entity

06/01/2018

03/31/2019

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number

g Country in which principal business activity is conducted

h Principal business activity

i Functional currency

2 Provide the following information for the FDE's or FB's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States

Jessica Rabbit Inc. 37 Anyplace Blvd. Port Erin, Isle of Man IM9 6AF

b Name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the FDE or FB, and the location of such books and records, if different

3 For the tax owner of the FDE or FB (if different from the filer), provide the following (see instructions):

a Name and address

b Annual accounting period covered by the return (see instructions)

c(1) U.S. identifying number, if any

c(2) Reference ID number (see instructions)

C185038-23

d Country under whose laws organized

e Functional currency

Isle of Man

4 For the direct owner of the FDE or FB (if different from the tax owner), provide the following (see instructions):

a Name and address

b Country under whose laws organized

c U.S. identifying number, if any

d Functional currency

5 Attach an organizational chart that identifies the name, placement, percentage of ownership, tax classification, and country of organization of all entities in the chain of ownership between the tax owner and the FDE or FB, and the chain of ownership between the FDE or FB and each entity in which the FDE or FB has a 10% or more direct or indirect interest. See instructions.

**Schedule C Income Statement** (see instructions)

**Important:** Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use U.S. dollar approximate separate transactions method of accounting (DASTM). If you are using the average exchange rate (determined under section 989(b)), check the following box

	Functional Currency	U.S. Dollars
1	1	
2	2	
3	3	
4	4	
5	5	
6	6	
7	7	
8	8	
9	9	
10	10	
11	11	
12	12	
13	13	
14	14	

**Schedule C-1 Section 987 Gain or Loss Information**

**Note:** See the instructions if there are multiple recipients of remittances from the FDE or FB.

	(a) Amount stated in functional currency of FDE or FB	(b) Amount stated in functional currency of recipient	
		Yes	No
1	1		
2	2		
3	3		
4			✓
5			✓

**Schedule F Balance Sheet**

**Important:** Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	1		
2	2		
3	3		
<b>Liabilities and Owner's Equity</b>			
4	4		
5	5		
6	6		

**Schedule G Other Information**

	Yes	No
1		✓
2		✓
3		
4		✓
5		✓

Schedule G Other Information (continued)

Table with 2 columns: Question/Description and Yes/No. Rows include questions 6, 7a, 7b, 7c, 8a, 8b, 8c, 9, 10a, 10b, 11a, 11b, 11c, 12a, 12b, 12c, 12d, 12e, 12f, 12g, 12h, 12i, 12j, 12k, 12l, 12m, 12n, 12o, 12p, 12q, 12r, 12s, 12t, 12u, 12v, 12w, 12x, 12y, 12z.

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: Enter the amounts on lines 1 through 6 in functional currency.

Table with 2 columns: Description and Amount. Rows include: 1 Current year net income (loss) per foreign books of account, 2 Total net additions, 3 Total net subtractions, 4 Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3), 5 DASTM gain (loss) (if applicable), 6 Combine lines 4 and 5, 7 Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average exchange rate determined under section 989(b) and the related regulations (see instructions)), 8 Enter exchange rate used for line 7.

**Schedule I Transferred Loss Amount** (see instructions)

**Important:** See instructions for who has to complete this section.

		Yes	No
1	Were any assets of an FB (including an FB that is an FDE) transferred to a foreign corporation? If "No," stop here. If "Yes," go to line 2 . . . . .		✓
2	Was the transferor a domestic corporation that transferred substantially all of the assets of an FB (including an FB that is an FDE) to a specified 10%-owned foreign corporation? If "No," stop here. If "Yes," go to line 3 . . . . .		
3	Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? If "No," stop here. If "Yes," go to line 4 . . . . .		
4	Enter the transferred loss amount included in gross income as required under section 91. See instructions . . . . .	<b>4</b>	

**Schedule J Income Taxes Paid or Accrued** (see instructions)

(a) Country or Possession	Foreign Income Taxes				Foreign Tax Credit Separate Categories			
	(b) Foreign Tax Year (YYYY-MM-DD)	(c) Foreign Currency	(d) Conversion Rate	(e) U.S. Dollars	(f) Foreign Branch	(g) Passive	(h) General	(i) Other
<b>Totals</b>								

If this is an amended report, check here

Enter the number of Schedules A (Form 8975) attached to this Form 8975 ▶

3

**Part I Identification of Filer**

<b>1a</b> Name of the reporting entity <u>Roger Rabbit Inc.</u>		<b>1b</b> Reporting role code <u>ULT</u>	<b>1c</b> EIN <u>00-0000004</u>
<b>2</b> Number, street, and room or suite no. (if P.O. box, see instructions) <u>35 Any Street</u>			
<b>3a</b> City or town <u>Anytown</u>	<b>3b</b> State or province <u>NY</u>	<b>3c</b> Country, and ZIP or foreign postal code <u>10006</u>	
<b>4</b> Name of the U.S. Multinational Enterprise (MNE) group (if different from reporting entity)			

**Part II Additional Information**

Enter any additional information related to the U.S. MNE group

Established in 1927 in Honolulu, Roger Rabbit Inc. is a financial services company working with individuals and companies worldwide. We have 16 offices located in the US, UK, and Isle of Man. Our investment strategies and financial advice are always tailored to meet our client's specific needs, because we want to add value to their company or organization. We have the skills to attract other investors, which introduces our wide range of clients to new sources of capital. We give our clients the ability to do their business better. We have been successful for 90 years because of the dedication each of our trained financial analysts provides to our customers. When pairing that superior service with constant innovation, our clients win. We fully analyze the credit strengths of each of our clients, and develop a funding plan specific to them. Several of our offices around the world also provide additional funding options to our clients by offering access to government mortgage insurance and loan guarantee programs. Here, we combine investment banking and mortgage banking services, which saves our clients time and reduces overall costs. Roger Rabbit Inc offers a wide variety of financial products that enables companies and individuals to manage the level of risk they are comfortable with. We also broaden their access to both foreign and domestic capital markets. Our tailored advice helps unlock private sector investments, which clients need if they want to expand their businesses, create jobs throughout their companies, and grow economies all over the world. Roger Rabbit Inc's Institutional Asset Management Solutions are comprised of a full range of integrated technologies. These are designed to help our clients improve operational efficiencies in all areas of their business. We leverage the advanced technology within our company to deliver better service, products, and advice to our client's companies. It is designed with our clients and their investors in mind, and has a proven track record of reducing manual processes, mitigating errors and risks, and improving operational efficiencies. We always have security in mind, which is why this is all done in a protected environment. We help our clients eliminate manual tasks and preserve that time to focus on what they do best: work with their customers to achieve their goals. We stay constantly apprised of regulations and



**Part II** Additional Information *(continued)*

changes in the financial landscape, and we use that to help our clients to become more flexible and transparent within the everchanging investment management industry. Our clients learn how to adapt and manage these new demands with the help of our advanced financial analysts. Roger Rabbit Inc's products and services include loans, equity, trade and supply chain finance, syndications, treasury client solutions, blended finance, venture capital, advisory, and asset management. We also offer expertise in financial institutions, funds, infrastructure, oil, gas, and mining, public-private partnerships, and tourism, retail, and property. Roger Rabbit Inc. also works throughout the private sector to encourage entrepreneurship and build sustainable businesses. We do that by advising our clients on a wide range of issues. First, we have a dedicated team in each of our offices that focuses on environmental, social, and governance standards specific to what will impact our client's finances. We help expand access to critical finance for individuals and micro, small, and medium enterprises. We do that through our work with financial intermediary clients. Roger Rabbit Inc. knows its clients and gives them the skills and tools they need to succeed. With us, our clients become some of the most successful companies in the world.

**October 05, 2023**  
**SCHEDULE A**  
**(Form 8975)**

(Rev. December 2020)

Department of the Treasury  
 Internal Revenue Service

Name of the reporting entity

Roger Rabbit Inc.

**Tax Year 2023**  
**1120 MeF ATS Scenario 4**

**Tax Jurisdiction and Constituent Entity Information**

For reporting period beginning January 1, 20 21, and ending December 31, 20 21

▶ A separate Schedule A (Form 8975) is to be completed for each tax jurisdiction of the multinational enterprise group.  
 ▶ Go to [www.irs.gov/Form8975](http://www.irs.gov/Form8975) for instructions and the latest information.

OMB No. 1545-2272

EIN

00-0000004

**Part I Tax Jurisdiction Information.** All financial amounts must be stated in U.S. dollars. See instructions.

Tax jurisdiction

US

1. Revenues			2. Profit (loss) before income tax	3. Income tax paid (on cash basis)	4. Income tax accrued—current year	5. Stated capital	6. Accumulated earnings	7. Number of employees	8. Tangible assets other than cash and cash equivalents
(a) Unrelated party	(b) Related party	(c) Total							
2,000,000,000	8,750,000	2,008,750,000	602,625,000	241,050,000	180,787,500	502,187,500	175,765,625	276	1,807,875,000

**Part II Constituent Entity Information**

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities		
				(a) Activity code	(b) If you entered the code for "Other," describe the business activity.	
Roger Rabbit Inc.		783021851	US	CBC509		

**Tax Year 2023  
1120 MeF ATS Scenario 4**

**October 05, 2023**

Schedule A (Form 8975) (Rev. 12-2020)

Page **2**

**Part II** **Constituent Entity Information** *(continued)*

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities			
				(a) Activity code			(b) If you entered the code for "Other," describe the business activity.

**Part III** **Additional Information**

Enter any additional information related to the information reported in Part I and II.

[No additional information needed.](#)

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**October 05, 2023**  
**SCHEDULE A**  
**(Form 8975)**

(Rev. December 2020)  
 Department of the Treasury  
 Internal Revenue Service

Name of the reporting entity

Roger Rabbit Inc.

**Part I Tax Jurisdiction Information.** All financial amounts must be stated in U.S. dollars. See instructions.

Tax jurisdiction

UK

1. Revenues			2. Profit (loss) before income tax	3. Income tax paid (on cash basis)	4. Income tax accrued—current year	5. Stated capital	6. Accumulated earnings	7. Number of employees	8. Tangible assets other than cash and cash equivalents
(a) Unrelated party	(b) Related party	(c) Total							
350,000,000	0	350,000,000	105,000,000	21,000,000	15,750,000	87,500,000	30,625,000	150	315,000,000

**Part II Constituent Entity Information**

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities		
				(a) Activity code	(b) If you entered the code for "Other," describe the business activity.	
Eddie Valiant Inc.		9999559999	UK	CBC508		

**Tax Jurisdiction and Constituent Entity Information**

For reporting period beginning \_\_\_\_\_, 20\_\_\_\_, and ending \_\_\_\_\_, 20\_\_\_\_

▶ A separate Schedule A (Form 8975) is to be completed for each tax jurisdiction of the multinational enterprise group.  
 ▶ Go to [www.irs.gov/Form8975](http://www.irs.gov/Form8975) for instructions and the latest information.

OMB No. 1545-2272

EIN

00-0000004

**Tax Year 2023  
1120 MeF ATS Scenario 4**

**October 05, 2023**

Schedule A (Form 8975) (Rev. 12-2020)

Page **2**

**Part II** **Constituent Entity Information** *(continued)*

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities			
				(a) Activity code			(b) If you entered the code for "Other," describe the business activity.

**Part III** **Additional Information**

Enter any additional information related to the information reported in Part I and II.

[No additional information needed.](#)

**October 05, 2023**  
**SCHEDULE A**  
**(Form 8975)**

(Rev. December 2020)

Department of the Treasury  
 Internal Revenue Service

Name of the reporting entity

Roger Rabbit Inc.

**Part I Tax Jurisdiction Information.** All financial amounts must be stated in U.S. dollars. See instructions.

Tax jurisdiction

UK

1. Revenues			2. Profit (loss) before income tax	3. Income tax paid (on cash basis)	4. Income tax accrued—current year	5. Stated capital	6. Accumulated earnings	7. Number of employees	8. Tangible assets other than cash and cash equivalents
(a) Unrelated party	(b) Related party	(c) Total							
125,000,000	0	125,000,000	37,500,000	0	0	31,250,000	10,937,500	113	112,500,000

**Part II Constituent Entity Information**

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities	
				(a) Activity code	(b) If you entered the code for "Other," describe the business activity.
Jessica Rabbit Inc.		C185038-23	IM	CBC508	
Judge Doom Inc.		C048374-12	IM	CBC509	
Baby Herman Inc.		C612403-50	IM	CBC508	
Benny the Cab Inc.		C124918-52	IM	CBC509	
Toon Patrol Inc.		C829851-93	IM	CBC509	
Dolores Inc.		C098483-55	IM	CBC509	
R.K. Maroon Inc.		C812512-49	IM	CBC508	
Marvin Acme Inc.		C1209855-88	IM	CBC509	
Lt. Santino Inc.		C783483-33	IM	CBC508	
Yosemite Sam Inc.		C129494-31	IM	CBC509	
Lena Hyena Inc.		C759420-06	IM	CBC509	
Donald Duck Inc.		C987314-34	IM	CBC509	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 69310N

Schedule A (Form 8975) (Rev. 12-2020)

**Tax Jurisdiction and Constituent Entity Information**

For reporting period beginning \_\_\_\_\_, 20\_\_\_\_, and ending \_\_\_\_\_, 20\_\_\_\_

▶ A separate Schedule A (Form 8975) is to be completed for each tax jurisdiction of the multinational enterprise group.  
 ▶ Go to [www.irs.gov/Form8975](http://www.irs.gov/Form8975) for instructions and the latest information.

OMB No. 1545-2272

EIN

00-0000004

**October 05, 2023**

**Part II** Constituent Entity Information *(continued)*

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities			
				(a) Activity code			(b) If you entered the code for "Other," describe the business activity.

**Part III** Additional Information

Enter any additional information related to the information reported in Part I and II.

[No additional information needed.](#)

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