



¿ES CUESTIÓN DE FATCA O CRS?

Lo Que Todo Inversionista Con Cuentas Extranjeras Debe Saber

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Este guía proporciona información útil y práctica respecto a FATCA y CRS. El autor no está prestando asesoría en planeación legal, fiscal, o financiera. Si requieres de estos servicios, necesitas buscar la ayuda de expertos.

La ley americana Foreign Account Tax Compliance Act, mejor conocida como FATCA, por sus siglas en inglés, es una ley que afecta la revelación y transparencia de cuentas extranjeras de causantes fiscales americanos. En un intento mal implementado de Estados Unidos por reducir la evasión fiscal, la promulgación de la ley FATCA ha creado serios dolores de cabeza tanto para los inversionistas extranjeros como para los de EE.UU., por igual. Por su parte, su homólogo global, el conjunto de normas llamadas Common Standard on Reporting and Due Diligence for Financial Account Information, o CRS por sus siglas en inglés, y comúnmente llamado por algunos como “FATCA en esteroides”, ha creado dudas y preocupaciones similares alrededor del mundo.

Al imponer altas multas económicas y causar serias preocupaciones de privacidad, FATCA ha tenido consecuencias de gran alcance al impactar también las actividades de mexicanos que residen o invierten en Estados Unidos y el resto del mundo. Sigue leyendo para tener un mejor panorama de qué debes saber, como inversionista mexicano, acerca de FATCA, y cómo el equipo calificado de MEG International Counsel, PC te puede ayudar a asegurarte que estás cumpliendo con la ley, al mismo tiempo que minimizas riesgos y logras la paz mental que te mereces.

¿Qué es FATCA?

FATCA fue promulgada en 2010 en Estados Unidos, la cual inició su aplicación mundial a partir de 2014, como la sección de recaudación de impuestos de la propuesta de ley para estimular el empleo en EE.UU. que resultara en la ley conocida como Hiring Incentives to Restore Employment o HIRE, por sus iniciales en inglés. Esta ley se utiliza para ubicar a los ciudadanos y a los residentes americanos para efectos fiscales. Los Estados Unidos es atípico en cuanto a que es uno de los dos únicos países alrededor del mundo que fiscaliza a sus ciudadanos residentes y no residentes. Esta definición extraterritorial de las fronteras del país para efectos fiscales ha creado una carga fiscal adicional para aquellos que quieren aprovechar la naturaleza global de las oportunidades que brinda el mercado de negocios moderno.

Las instituciones financieras americanas obligadas al cumplimiento de FATCA tienen que reportar al departamento del tesoro americano información respecto de las cuentas que tengan de personas o empresas extranjeras. Por su parte, las instituciones financieras extranjeras fuera del territorio americano, tienen que hacer el mismo reporte respecto de las cuentas de personas americanas, así como con respecto de las cuentas de empresas nacionales o extranjeras en las que participe el capital americano.

¿Por Qué Se Promulgó FATCA?

La insistencia de una mayor reglamentación de activos en el extranjero propiedad de personas americanas, y de empresas en las que participa el capital americano, comenzó en el 2009 cuando un banco europeo sobresalió en las noticias nacionales por ayudar a más de 17,000 clientes americanos en su búsqueda por evitar el pago de impuestos en EE.UU. por más de \$20,000 millones de dólares—\$20 billones de dólares conforme al sistema americano—en activos. Este caso resultó en una multa de \$780 millones de dólares para el banco, y en el juicio penal de algunos de los clientes, así como de un alto funcionario del banco.

El objetivo de FATCA es promover la transparencia de activos financieros en cuentas extranjeras de personas y entes legales americanos. La ley proporciona a las autoridades fiscales de EE.UU. con una fuente de información independiente respecto de los activos extranjeros de personas y empresas americanas debido a que las propias instituciones financieras extranjeras están obligadas

a buscar en sus bases de datos y revelar los nombres de sus cuentahabientes americanos, su número de identificación fiscal, sus domicilios, así como la gran mayoría de las transacciones en cada cuenta.

¿Quién Debe Cumplir con FATCA?

Las personas físicas definidas como personas americanas bajo FATCA incluyen:

- Ciudadanos americanos, aún aquellos que viven fuera de los EE.UU. o tengan doble nacionalidad
- Residentes de EE.UU. actuales, sin importar su ciudadanía (incluyendo los que tienen una “green card”)
- Las personas físicas extranjeras con cuentas reportables en EE.UU. cuyos países de residencia tengan celebrado un acuerdo intergubernamental para implementar FATCA con EE.UU.

Hay que tomar nota que los llamados “americanos por accidente” han sido afectados desproporcionadamente por FATCA. Un “americano por accidente” es una persona que es residente de un país, distinto a Estados Unidos, y por lo general no sabe que es considerada como ciudadana americana para efectos fiscales. Típicamente, estas personas son hijos de un ciudadano americano que emigró de los Estados Unidos, o bien, que habiendo nacido en EE.UU. es hijo de padres extranjeros mientras residían temporalmente en el país.

Los entes legales, nacionales o extranjeros, afectados por FATCA incluyen:

- Fideicomisos o trusts
- Partnerships o asociaciones
- Corporaciones o compañías
- Entidades y agencias gubernamentales, en ciertos casos

¿Qué Información Recauda FATCA?

FATCA ordena la recaudación de la siguiente información respecto a inversionistas extranjeros:

- Nombre
- Domicilio
- Número de identificación fiscal del país de residencia (RFC/CURP para residentes de México)
- Nombre de la institución financiera o bancaria
- Número de cuenta
- Intereses brutos anuales mayores a \$10 dólares, derivados de los activos reportables
- Dividendos brutos pagados o acreditados por los activos reportables
- Ingreso bruto pagado o acreditado, derivado de los activos reportables

¿Qué Activos Deben Ser Reportados?

FATCA no incluye todo tipo de activos pues solo las cuentas financieras son reportables. Esto significa que los extranjeros propietarios de inversiones inmobiliarias no necesitan cumplir con la ley por este tipo de inversiones.

Cuentas financieras de extranjeros reportables bajo FATCA incluyen:

- Cuentas de depósito
- Cuentas de custodia
- Contratos de seguros y anualidades
- Cierta tipo de deuda y participación de capital en una institución financiera extranjera o FFI, que no cotice en la bolsa regularmente en un mercado de valores preexistente

Los activos extranjeros sujetos a FATCA son valuados utilizando su valor de mercado en la moneda en que están denominados los instrumentos que los contienen. Las personas sujetas a FATCA deben saber el valor de mercado más alto anual del activo en cualquier momento durante el año calendario, así como el valor de mercado en el último día del año. Estos valores son convertidos a dólares americanos utilizando el tipo de cambio del último día del año.

¿Cuál Es La Cantidad Mínima Para Reportar?

El límite mínimo para reportar al amparo de FATCA depende de tu residencia y de tu estado civil.

Para causantes fiscales americanos viviendo en los Estados Unidos, es decir, personas solteras con activos financieros extranjeros específicos, con un valor total mayor a \$50,000 dólares en el último día del año fiscal, o bien, con un valor total mayor a \$75,000 dólares durante cualquier momento del año, están obligadas a reportar al amparo de FATCA. Las cantidades mínimas para reportar se duplican para las personas casadas.

Para los causantes fiscales americanos viviendo fuera de Estados Unidos, es decir, las personas solteras con activos financieros extranjeros específicos, con un valor total mayor a \$200,000 dólares en el último día del año, o bien, con un valor total mayor a \$300,000 dólares durante cualquier momento del año, están obligadas a reportar al amparo de FATCA. Las cantidades mínimas para reportar se duplican para las personas casadas.

Si estás casado(a) pero declaras en EE.UU. por separado de tu esposo(a), quedas obligado a los límites utilizados para los solteros.

Como dijimos anteriormente, si eres ciudadano y residente extranjero, en relación con Estados Unidos, entonces te aplican los límites expuestos más arriba en la sección relativa a qué información recauda FATCA.

¿Qué Es Una Institución Financiera Extranjera (FFI)?

Cualquier institución financiera no ubicada en los EE.UU. es una FFI de acuerdo a FATCA.

De acuerdo a FATCA, las instituciones financieras son definidas en una forma mucho más amplia a la que están acostumbrados los inversionistas extranjeros. La definición de FATCA incluye:

- Instituciones de depósito
- Instituciones de Custodia
- Compañías de seguros

- Entidades de inversión
- Compañías “Holding” de otras FFI

¿Qué Es Una Institución No Financiera Extranjera (NFFE)?

Si un ente no es considerado una FFI de acuerdo a FATCA, entonces será una institución no financiera extranjera (NFFE). Las NFFE están subdivididas en activas y pasivas. Las NFFE activas obtienen 50% o más de sus ingresos de actividades comerciales, mientras que las NFEE pasivas obtienen más del 50% de sus ingresos de inversiones pasivas.

Como NFFE, la información relativa a un fideicomiso, compañía, o entidad es la que es reportada—preservando así la privacidad de los propios inversionistas. Si una NFFE se convierte en FFI, la información personal del último beneficiario o de cualquier persona con control del activo financiero debe ser reportada.

¿Cómo Funciona El Cumplimiento con FATCA?

En los Estados Unidos, la forma 8938, llamada “Statement of Specified Foreign Financial Assets”, se requiere para que los ciudadanos y residentes americanos cumplan con FATCA, y forma parte de la declaración fiscal anual de los americanos. Se parece mucho a las versiones anteriores para el FBAR o “Foreign Bank Account Report”—pero con mucho más detalle. Hay que tomar nota que las versiones actuales del FBAR y de la forma 8938 son dos requisitos distintos. Aunque ya hayas presentado la forma FBAR, puede ser que también necesites presentar la forma 8938.

Para cumplir con FATCA, los inversionistas mexicanos y extranjeros también deben llenar la forma W-8. El propósito es notificar a la institución financiera que estas personas o empresas no deben ser gravadas en la misma forma que los americanos. De hecho, esta forma confiere una exención con respecto a la información que se proporciona anualmente en las declaraciones fiscales en Estados Unidos, así como con respecto a las reglas aplicables a ciertas retenciones.

La forma W-8 a veces se confunde con la forma W-9. La diferencia estriba en que la forma fiscal W-9 solo se utiliza por empresas o asociaciones que fueron creadas o constituidas en Estados Unidos.

Existen seis versiones diferentes de la forma W-8. La variante apropiada está directamente relacionada con la nacionalidad y residencia de la persona física, así como con el tipo de ente o vehículo legal que esté presentando la forma o proporcionando la información, y el tipo de ingreso de que se trate. (Favor de referirse al Apéndice para ejemplos de estas formas)

- **W-8 BEN.** Certificado de Estatus Extranjero de Dueño-Beneficiario para el Reporte y Retención de Impuestos de Estados Unidos (Personas Físicas)
- **W-8 BEN-E.** Certificado de Estatus de Dueño-Beneficiario para el Reporte y Retención de Impuestos de Estados Unidos (Entes)
- **W-8 IMY.** Certificado de Intermediario Extranjero, Entidad Extranjera Transparente, o Ciertas Sucursales en EE.UU. para el Reporte y Retención de Impuestos de Estados Unidos
- **W-8 ECI.** Certificado de Reclamación por Persona Extranjera que su Ingreso Está Efectivamente Conectado con la Conducción de una Actividad Comercial o Negocio en los Estados Unidos

- **W-8 EXP.** Certificado de Gobierno Extranjero u Otra Organización Extranjera para el Reporte y Retención de Impuestos de Estados Unidos
- **W-8 CE.** Notificación de Expatriación y Renuncia a Beneficio de Tratado

El problema con las diferentes versiones de la forma W-8 es que cada extranjero se tiene que clasificar a sí mismo. Si no entiendes cómo clasificarte correctamente, te arriesgas a llenar la forma equivocada y caer en incumplimiento. Consultar a un abogado fiscalista es la mejor forma de evitar las sanciones de FATCA.

Es de suma importancia que los inversionistas mexicanos hagan revisar su forma W-8 cada año, y sobre todo, cada vez que haya un cambio en las circunstancias de sus actividades de inversión. Cambios relativos al crecimiento normal de un negocio o empresa pueden tener consecuencias significativas al amparo de FATCA. Por ejemplo, si a tu ente legal alguien le proporcionó el servicio de llenar la forma W-8 hace años cuando tuvo que presentarla por primera vez, y lo clasificaron como NFFE, pero desde entonces ha contratado u obtenido los servicios de un asesor financiero con discreción para manejar sus inversiones, se ha convertido en una FFI y necesita clasificarse como tal ahora, o bien, modificar sus circunstancias.

Hay que tomar nota que aunque la forma W-8 fue creada por el IRS para su uso en Estados Unidos, esta forma se entrega a la institución financiera directamente y no como parte de la presentación de una declaración fiscal en EE.UU. Además, FATCA le ha dado completa discreción a las FFI para requerir más información de la que se incluye en los acuerdos intergubernamentales y en la propia forma W-8, si consideran que el cuentahabiente está mintiendo, falsificando información, o si tienen la sospecha de que algunos beneficiarios deben ser considerados personas americanas. Por ende, una FFI puede negar un servicio a un cliente o prospecto sin importar que la forma W-8 haya sido llenada en su totalidad, o se haya cumplido con el acuerdo intergubernamental.

Para las FFI sujetas a FATCA, el reporte de información se tiene que hacer a través de la autoridad fiscal de su país (si se tiene el Modelo 1 del acuerdo intergubernamental), o directamente con el IRS (si se tiene el Modelo 2 del acuerdo intergubernamental, o bien, si no se tiene celebrado ningún acuerdo intergubernamental). México tiene celebrado el Modelo 1 del acuerdo intergubernamental.

¿Cuáles son Las Sanciones por Incumplimiento?

Las sanciones por no cumplir con FATCA se aplican a las personas y entes legales americanos al igual que a las FFI.

En los Estados Unidos, el IRS impone una multa de \$10,000 dólares por no presentar la forma 8938, o bien, por presentarla incompleta, o presentar cualquier otro documento incorrecto. Las sanciones por incumplimiento después de recibir un requerimiento oficial pueden alcanzar hasta los \$50,000 dólares. El pago incompleto del impuesto atribuible a activos financieros extranjeros no revelados tiene como consecuencia una sanción adicional del 40% cuando exista una diferencia sustancial en el pago incompleto.

Las FFI no participantes están sujetas a una retención del 30% del ingreso proveniente de EE.UU. Como resultado de esta sanción tan fuerte, es cada vez más común que las propias instituciones financieras extranjeras simplemente han dejado de tener como clientes a personas que tienen ciudadanía americana, o bien, a personas que se rehúsan a proporcionar información requerida por FATCA.

Existen varios países que han implementado sus propias sanciones por no cumplir con FATCA.

¿Cuáles son Las Críticas Relacionadas con FATCA?

Desde que se promulgó, FATCA ha sido criticada ampliamente tanto dentro y fuera de EE.UU. Inclusive, ha habido varios intentos de derogar la ley pero los esfuerzos de los congresistas republicanos han sido en vano hasta ahora.

La ley FATCA es extremadamente compleja y existe una desigualdad en los requisitos para su cumplimiento. Los Estados Unidos tampoco han proporcionado ninguna ayuda o compensación económica a las instituciones financieras extranjeras por los costos en que han incurrido para implementar los reportes, por lo que algunos líderes de varios países han descrito a la legislación como divisiva e imperialista.

A nivel personal, se ha roto el record histórico de renuncias a la ciudadanía americana en un año, desde que se promulgó FATCA—se incrementaron de 743 en 2009 a 5,411 en 2016. Las obligaciones o cargas impuestas por FATCA juegan un papel importante, cada vez más frecuente, en esta toma de decisión para aquellas personas con grandes patrimonios.

Para los inversionistas mexicanos existen serias preocupaciones respecto de la ilegalidad e inconstitucionalidad del acuerdo, y su exigibilidad. La seguridad personal y financiera son temas de gran importancia. El intercambio de información entre el Servicio de Administración Tributaria o SAT, y el Internal Revenue Service o IRS por sus siglas en inglés, no es nada nuevo. Sin embargo, antes del 2012 solo se hacía en virtud de una petición formal y por escrito, y respecto de causantes fiscales específicos. Ahora, ese intercambio es automático y permanente—poniendo en riesgo el robo de identidad, secuestro, y extorsión de inversionistas mexicanos.

La falta de seguridad que prevalece en México y en otros países latinoamericanos, ha inculcado en muchos la idea de que su información personal no está a salvo cuando la misma entra a los sistemas de cómputo de los distintos gobiernos. No es que los inversionistas se nieguen a pagar sus impuestos, por el contrario, pero sus temores por la seguridad de sus patrimonios, así como por la integridad física de sus familias, son más que justificados.

¿Por Qué Confunde FATCA a Los Inversionistas Extranjeros?

FATCA ha resultado ser confuso para los inversionistas extranjeros desde que fue implementada. Los inversionistas mexicanos frecuentemente no se dan cuenta que el utilizar ciertos entes legales extranjeros, como pueden ser las empresas de inversiones personales o PIC por sus siglas en inglés, o bien, por la utilización de fideicomisos como vehículos de inversión, pueden resultar obligados al cumplimiento de los requisitos de reporte de información de FATCA.

Por ejemplo, es muy común que los inversionistas mexicanos utilicen fideicomisos extranjeros como dueños directos de empresas subsidiarias o de cuentas en Estados Unidos. Si los fideicomisos extranjeros tienen a una institución corporativa fungiendo como fiduciario o “trustee”, pudiera ser clasificado como una entidad de inversión, y por ende, como una FFI. Los múltiples niveles de información y reportes que existen bajo FATCA, pueden detonarse si los fideicomisos son dueños a su vez de PIC extranjeras que invierten en EE.UU.

¿Cómo Están Relacionados FATCA y CRS?

CRS es un estándar global creado por la Organización para el Comercio y Desarrollo Económico (OCDE) a solicitud del G7 y del G20, para el intercambio transfronterizo de información sobre cuentas financieras. El primer reporte bajo CRS se dio en 2017.

A CRS generalmente se le refiere como la versión global de FATCA a pesar de que existen diferencias sustanciales entre los dos programas. Por ejemplo, CRS utiliza una definición diferente de institución financiera, no contiene límites mínimos de intercambio de información, y tiene un alcance mucho más amplio que FATCA, con más de 90 naciones intercambiando información entre todas ellas.

Los inversionistas no deben asumir que al cumplir con FATCA, automáticamente están cumpliendo también con CRS. El alcance ambicioso de CRS requiere un análisis meticuloso, ya que las sanciones por no cumplir con sus reglas son impuestas por cada jurisdicción local.

Las preocupaciones de privacidad y seguridad hechas valer con respecto a FATCA, así como con respecto a sus requisitos de reporte de información, son igualmente válidas con respecto a CRS. Los inversionistas mexicanos que estén preocupados por su privacidad y por la integridad física de sus familias, derivadas de posibles secuestros o extorsiones, deben evitar reportar su información ellos mismos, así como utilizar asesores con los cuales la confidencialidad de la información que pretenden compartir no esté protegida y garantizada por las leyes aplicables.

¿Cómo Te Podemos Ayudar en MEG International Counsel, PC a Cumplir con FATCA y CRS?

Nuestra opinión profesional es que los inversionistas extranjeros deben de hacer lo que siempre han hecho: presentar sus declaraciones oportunamente y reportar sus ingresos, dividendos, e intereses derivados de fuentes en Estados Unidos. Aquellos que quieran evitar FATCA deben de agendar una cita con nosotros para platicar acerca de cómo una planeación de negocios y patrimonial internacional—requisitos de residencia, límites mínimos en cuentas, tiempos, obligaciones de instituciones financieras—puede ser utilizada para aprovechar una exención.

MEG International Counsel, PC es una firma propiedad de los abogados y esposos María Elia y Antonio Gastélum. María Elia tiene licencia y cédula profesional para ejercer el derecho tanto en California como en México, mientras que Antonio tiene cédula profesional y licencia para ejercer en México y Texas. Juntos aportan conocimientos sólidos de derecho internacional y soluciones personalizadas a personas y familias con grandes patrimonios, aún en los asuntos legales transfronterizos más complejos.

En MEG International Counsel, PC, entendemos el estilo de vida acelerado y ocupado del inversionista extranjero, por lo que manejamos la mayoría de los asuntos en línea. Por lo tanto, no es necesario que viajes a San Diego o a Houston para reunirte con nosotros. Simplemente marca nuestro número sin costo (800) 694-6604 para que descubras cómo te podemos ayudar.

Apéndice: Formas W-8 para Cumplimiento con FATCA y CRS

Los inversionistas extranjeros deben llenar una forma W-8 que debe ser entregada a las instituciones financieras que la requieran para cumplir con FATCA. La forma se utiliza para notificar que estas personas o entidades no deben ser gravadas como americanas. Para propósitos de CRS, las instituciones financieras requieren mucha de la misma información contenida en las formas W-8. Sin embargo, para cumplir con CRS, las formas pudieran ser diferentes o plasmarse en la papelería membretada de la institución financiera.

Existen seis versiones diferentes de la forma W-8 la cual requiere que cada extranjero se clasifique a sí mismo, de acuerdo a sus actividades de inversión. Se están proporcionando ejemplos de estas versiones de la forma para tu referencia, pero ten en cuenta que estos documentos pueden cambiar en cualquier momento de acuerdo a los reglamentos del IRS.

Las diferentes versiones de la forma W-8 son complicadas de llenar para el inversionista promedio y el cometer un pequeño error puede resultar en sanciones severas. Es recomendable que consulten a un profesional en impuestos para que les ayude con el llenado y la elección correcta de la versión requerida.

Certificate of Foreign Status of Beneficial Owner for United States Tax Withholding and Reporting (Individuals)

- For use by individuals. Entities must use Form W-8BEN-E.
- Go to www.irs.gov/FormW8BEN for instructions and the latest information.
- Give this form to the withholding agent or payer. Do not send to the IRS.

Do NOT use this form if:

- You are NOT an individual W-8BEN-E
- You are a U.S. citizen or other U.S. person, including a resident alien individual W-9
- You are a beneficial owner claiming that income is effectively connected with the conduct of trade or business within the U.S. (other than personal services) W-8ECI
- You are a beneficial owner who is receiving compensation for personal services performed in the United States 8233 or W-4
- You are a person acting as an intermediary W-8IMY

Note: If you are resident in a FATCA partner jurisdiction (i.e., a Model 1 IGA jurisdiction with reciprocity), certain tax account information may be provided to your jurisdiction of residence.

Part I Identification of Beneficial Owner (see instructions)

1 Name of individual who is the beneficial owner	2 Country of citizenship
3 Permanent residence address (street, apt. or suite no., or rural route). Do not use a P.O. box or in-care-of address.	
City or town, state or province. Include postal code where appropriate. Country	
4 Mailing address (if different from above)	
City or town, state or province. Include postal code where appropriate. Country	
5 U.S. taxpayer identification number (SSN or ITIN), if required (see instructions)	6 Foreign tax identifying number (see instructions)
7 Reference number(s) (see instructions)	8 Date of birth (MM-DD-YYYY) (see instructions)

Part II Claim of Tax Treaty Benefits (for chapter 3 purposes only) (see instructions)

9 I certify that the beneficial owner is a resident of _____ within the meaning of the income tax treaty between the United States and that country.

10 **Special rates and conditions** (if applicable—see instructions): The beneficial owner is claiming the provisions of Article and paragraph _____ of the treaty identified on line 9 above to claim a _____ % rate of withholding on (specify type of income):

Explain the additional conditions in the Article and paragraph the beneficial owner meets to be eligible for the rate of withholding: _____

Part III Certification

Under penalties of perjury, I declare that I have examined the information on this form and to the best of my knowledge and belief it is true, correct, and complete. I further certify under penalties of perjury that:

- I am the individual that is the beneficial owner (or am authorized to sign for the individual that is the beneficial owner) of all the income to which this form relates or am using this form to document myself for chapter 4 purposes,
- The person named on line 1 of this form is not a U.S. person,
- The income to which this form relates is:
 - (a) not effectively connected with the conduct of a trade or business in the United States,
 - (b) effectively connected but is not subject to tax under an applicable income tax treaty, or
 - (c) the partner's share of a partnership's effectively connected income,
- The person named on line 1 of this form is a resident of the treaty country listed on line 9 of the form (if any) within the meaning of the income tax treaty between the United States and that country, and
- For broker transactions or barter exchanges, the beneficial owner is an exempt foreign person as defined in the instructions.

Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the income of which I am the beneficial owner or any withholding agent that can disburse or make payments of the income of which I am the beneficial owner. I **agree that I will submit a new form within 30 days if any certification made on this form becomes incorrect.**

Sign Here

Signature of beneficial owner (or individual authorized to sign for beneficial owner)

Date (MM-DD-YYYY)

Print name of signer

Capacity in which acting (if form is not signed by beneficial owner)

**Certificate of Status of Beneficial Owner for
United States Tax Withholding and Reporting (Entities)**

► For use by entities. Individuals must use Form W-8BEN. ► Section references are to the Internal Revenue Code.
 ► Go to www.irs.gov/FormW8BENE for instructions and the latest information.
 ► Give this form to the withholding agent or payer. Do not send to the IRS.

Do NOT use this form for:

- U.S. entity or U.S. citizen or resident W-9
- A foreign individual W-8BEN (Individual) or Form 8233
- A foreign individual or entity claiming that income is effectively connected with the conduct of trade or business within the U.S. (unless claiming treaty benefits) W-8ECI
- A foreign partnership, a foreign simple trust, or a foreign grantor trust (unless claiming treaty benefits) (see instructions for exceptions) W-8IMY
- A foreign government, international organization, foreign central bank of issue, foreign tax-exempt organization, foreign private foundation, or government of a U.S. possession claiming that income is effectively connected U.S. income or that is claiming the applicability of section(s) 115(2), 501(c), 892, 895, or 1443(b) (unless claiming treaty benefits) (see instructions for other exceptions) W-8ECI or W-8EXP
- Any person acting as an intermediary (including a qualified intermediary acting as a qualified derivatives dealer) W-8IMY

Instead use Form:

W-9

Part I Identification of Beneficial Owner

1 Name of organization that is the beneficial owner	2 Country of incorporation or organization
3 Name of disregarded entity receiving the payment (if applicable, see instructions)	
4 Chapter 3 Status (entity type) (Must check one box only):	<input type="checkbox"/> Corporation <input type="checkbox"/> Disregarded entity <input type="checkbox"/> Partnership <input type="checkbox"/> Simple trust <input type="checkbox"/> Grantor trust <input type="checkbox"/> Complex trust <input type="checkbox"/> Estate <input type="checkbox"/> Government <input type="checkbox"/> Central Bank of Issue <input type="checkbox"/> Tax-exempt organization <input type="checkbox"/> Private foundation <input type="checkbox"/> International organization
If you entered disregarded entity, partnership, simple trust, or grantor trust above, is the entity a hybrid making a treaty claim? If "Yes" complete Part III.	
5 Chapter 4 Status (FATCA status) (See instructions for details and complete the certification below for the entity's applicable status.)	<input type="checkbox"/> Nonparticipating FFI (including an FFI related to a Reporting IGA FFI other than a deemed-compliant FFI, participating FFI, or exempt beneficial owner). <input type="checkbox"/> Participating FFI. <input type="checkbox"/> Reporting Model 1 FFI. <input type="checkbox"/> Reporting Model 2 FFI. <input type="checkbox"/> Registered deemed-compliant FFI (other than a reporting Model 1 FFI, sponsored FFI, or nonreporting IGA FFI covered in Part XII). See instructions. <input type="checkbox"/> Sponsored FFI. Complete Part IV. <input type="checkbox"/> Certified deemed-compliant nonregistering local bank. Complete Part V. <input type="checkbox"/> Certified deemed-compliant FFI with only low-value accounts. Complete Part VI. <input type="checkbox"/> Certified deemed-compliant sponsored, closely held investment vehicle. Complete Part VII. <input type="checkbox"/> Certified deemed-compliant limited life debt investment entity. Complete Part VIII. <input type="checkbox"/> Certain investment entities that do not maintain financial accounts. Complete Part IX. <input type="checkbox"/> Owner-documented FFI. Complete Part X. <input type="checkbox"/> Restricted distributor. Complete Part XI.
<input type="checkbox"/> Nonreporting IGA FFI. Complete Part XII. <input type="checkbox"/> Foreign government, government of a U.S. possession, or foreign central bank of issue. Complete Part XIII. <input type="checkbox"/> International organization. Complete Part XIV. <input type="checkbox"/> Exempt retirement plans. Complete Part XV. <input type="checkbox"/> Entity wholly owned by exempt beneficial owners. Complete Part XVI. <input type="checkbox"/> Territory financial institution. Complete Part XVII. <input type="checkbox"/> Excepted nonfinancial group entity. Complete Part XVIII. <input type="checkbox"/> Excepted nonfinancial start-up company. Complete Part XIX. <input type="checkbox"/> Excepted nonfinancial entity in liquidation or bankruptcy. Complete Part XX. <input type="checkbox"/> 501(c) organization. Complete Part XXI. <input type="checkbox"/> Nonprofit organization. Complete Part XXII. <input type="checkbox"/> Publicly traded NFFE or NFFE affiliate of a publicly traded corporation. Complete Part XXIII. <input type="checkbox"/> Excepted territory NFFE. Complete Part XXIV. <input type="checkbox"/> Active NFFE. Complete Part XXV. <input type="checkbox"/> Passive NFFE. Complete Part XXVI. <input type="checkbox"/> Excepted inter-affiliate FFI. Complete Part XXVII. <input type="checkbox"/> Direct reporting NFFE. <input type="checkbox"/> Sponsored direct reporting NFFE. Complete Part XXVIII. <input type="checkbox"/> Account that is not a financial account.	
6 Permanent residence address (street, apt. or suite no., or rural route). Do not use a P.O. box or in-care-of address (other than a registered address).	

City or town, state or province. Include postal code where appropriate.	Country
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7 Mailing address (if different from above)	
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City or town, state or province. Include postal code where appropriate.	Country
---	---------

8 U.S. taxpayer identification number (TIN), if required	9a GIIN	b Foreign TIN
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10 Reference number(s) (see instructions)	
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Note: Please complete remainder of the form including signing the form in Part XXX.

Part II Disregarded Entity or Branch Receiving Payment. (Complete only if a disregarded entity with a GIIN or a branch of an FFI in a country other than the FFI's country of residence. See instructions.)

11 Chapter 4 Status (FATCA status) of disregarded entity or branch receiving payment

Branch treated as nonparticipating FFI. Reporting Model 1 FFI. U.S. Branch.

Participating FFI. Reporting Model 2 FFI.

12 Address of disregarded entity or branch (street, apt. or suite no., or rural route). **Do not use a P.O. box or in-care-of address** (other than a registered address).

City or town, state or province. Include postal code where appropriate.

Country

13 GIIN (if any)

Part III Claim of Tax Treaty Benefits (if applicable). (For chapter 3 purposes only.)

14 I certify that (check all that apply):

a The beneficial owner is a resident of _____ within the meaning of the income tax treaty between the United States and that country.

b The beneficial owner derives the item (or items) of income for which the treaty benefits are claimed, and, if applicable, meets the requirements of the treaty provision dealing with limitation on benefits. The following are types of limitation on benefits provisions that may be included in an applicable tax treaty (check only one; see instructions):

<input type="checkbox"/> Government	<input type="checkbox"/> Company that meets the ownership and base erosion test
<input type="checkbox"/> Tax exempt pension trust or pension fund	<input type="checkbox"/> Company that meets the derivative benefits test
<input type="checkbox"/> Other tax exempt organization	<input type="checkbox"/> Company with an item of income that meets active trade or business test
<input type="checkbox"/> Publicly traded corporation	<input type="checkbox"/> Favorable discretionary determination by the U.S. competent authority received
<input type="checkbox"/> Subsidiary of a publicly traded corporation	<input type="checkbox"/> Other (specify Article and paragraph): _____

c The beneficial owner is claiming treaty benefits for U.S. source dividends received from a foreign corporation or interest from a U.S. trade or business of a foreign corporation and meets qualified resident status (see instructions).

15 Special rates and conditions (if applicable—see instructions):
 The beneficial owner is claiming the provisions of Article and paragraph _____ of the treaty identified on line 14a above to claim a _____ % rate of withholding on (specify type of income): _____
 Explain the additional conditions in the Article the beneficial owner meets to be eligible for the rate of withholding: _____

Part IV Sponsored FFI

16 Name of sponsoring entity: _____

17 Check whichever box applies.

I certify that the entity identified in Part I:

- Is an investment entity;
- Is not a QI, WP (except to the extent permitted in the withholding foreign partnership agreement), or WT; and
- Has agreed with the entity identified above (that is not a nonparticipating FFI) to act as the sponsoring entity for this entity.

I certify that the entity identified in Part I:

- Is a controlled foreign corporation as defined in section 957(a);
- Is not a QI, WP, or WT;
- Is wholly owned, directly or indirectly, by the U.S. financial institution identified above that agrees to act as the sponsoring entity for this entity; and
- Shares a common electronic account system with the sponsoring entity (identified above) that enables the sponsoring entity to identify all account holders and payees of the entity and to access all account and customer information maintained by the entity including, but not limited to, customer identification information, customer documentation, account balance, and all payments made to account holders or payees.

Part V Certified Deemed-Compliant Nonregistering Local Bank18 I certify that the FFI identified in Part I:

- Operates and is licensed solely as a bank or credit union (or similar cooperative credit organization operated without profit) in its country of incorporation or organization;
- Engages primarily in the business of receiving deposits from and making loans to, with respect to a bank, retail customers unrelated to such bank and, with respect to a credit union or similar cooperative credit organization, members, provided that no member has a greater than 5% interest in such credit union or cooperative credit organization;
- Does not solicit account holders outside its country of organization;
- Has no fixed place of business outside such country (for this purpose, a fixed place of business does not include a location that is not advertised to the public and from which the FFI performs solely administrative support functions);
- Has no more than \$175 million in assets on its balance sheet and, if it is a member of an expanded affiliated group, the group has no more than \$500 million in total assets on its consolidated or combined balance sheets; **and**
- Does not have any member of its expanded affiliated group that is a foreign financial institution, other than a foreign financial institution that is incorporated or organized in the same country as the FFI identified in Part I and that meets the requirements set forth in this part.

Part VI Certified Deemed-Compliant FFI with Only Low-Value Accounts19 I certify that the FFI identified in Part I:

- Is not engaged primarily in the business of investing, reinvesting, or trading in securities, partnership interests, commodities, notional principal contracts, insurance or annuity contracts, or any interest (including a futures or forward contract or option) in such security, partnership interest, commodity, notional principal contract, insurance contract or annuity contract;
- No financial account maintained by the FFI or any member of its expanded affiliated group, if any, has a balance or value in excess of \$50,000 (as determined after applying applicable account aggregation rules); **and**
- Neither the FFI nor the entire expanded affiliated group, if any, of the FFI, have more than \$50 million in assets on its consolidated or combined balance sheet as of the end of its most recent accounting year.

Part VII Certified Deemed-Compliant Sponsored, Closely Held Investment Vehicle

20 Name of sponsoring entity:

21 I certify that the entity identified in Part I:

- Is an FFI solely because it is an investment entity described in Regulations section 1.1471-5(e)(4);
- Is not a QI, WP, or WT;
- Will have all of its due diligence, withholding, and reporting responsibilities (determined as if the FFI were a participating FFI) fulfilled by the sponsoring entity identified on line 20; **and**
- 20 or fewer individuals own all of the debt and equity interests in the entity (disregarding debt interests owned by U.S. financial institutions, participating FFIs, registered deemed-compliant FFIs, and certified deemed-compliant FFIs and equity interests owned by an entity if that entity owns 100% of the equity interests in the FFI and is itself a sponsored FFI).

Part VIII Certified Deemed-Compliant Limited Life Debt Investment Entity22 I certify that the entity identified in Part I:

- Was in existence as of January 17, 2013;
- Issued all classes of its debt or equity interests to investors on or before January 17, 2013, pursuant to a trust indenture or similar agreement; **and**
- Is certified deemed-compliant because it satisfies the requirements to be treated as a limited life debt investment entity (such as the restrictions with respect to its assets and other requirements under Regulations section 1.1471-5(f)(2)(iv)).

Part IX Certain Investment Entities that Do Not Maintain Financial Accounts23 I certify that the entity identified in Part I:

- Is a financial institution solely because it is an investment entity described in Regulations section 1.1471-5(e)(4)(i)(A), **and**
- Does not maintain financial accounts.

Part X Owner-Documented FFI

Note: This status only applies if the U.S. financial institution, participating FFI, or reporting Model 1 FFI to which this form is given has agreed that it will treat the FFI as an owner-documented FFI (see instructions for eligibility requirements). In addition, the FFI must make the certifications below.

24a (All owner-documented FFIs check here) I certify that the FFI identified in Part I:

- Does not act as an intermediary;
- Does not accept deposits in the ordinary course of a banking or similar business;
- Does not hold, as a substantial portion of its business, financial assets for the account of others;
- Is not an insurance company (or the holding company of an insurance company) that issues or is obligated to make payments with respect to a financial account;
- Is not owned by or in an expanded affiliated group with an entity that accepts deposits in the ordinary course of a banking or similar business, holds, as a substantial portion of its business, financial assets for the account of others, or is an insurance company (or the holding company of an insurance company) that issues or is obligated to make payments with respect to a financial account;
- Does not maintain a financial account for any nonparticipating FFI; **and**
- Does not have any specified U.S. persons that own an equity interest or debt interest (other than a debt interest that is not a financial account or that has a balance or value not exceeding \$50,000) in the FFI other than those identified on the FFI owner reporting statement.

Part X Owner-Documented FFI (continued)**Check box 24b or 24c, whichever applies.**

b I certify that the FFI identified in Part I:

- Has provided, or will provide, an FFI owner reporting statement that contains:
 - (i) The name, address, TIN (if any), chapter 4 status, and type of documentation provided (if required) of every individual and specified U.S. person that owns a direct or indirect equity interest in the owner-documented FFI (looking through all entities other than specified U.S. persons);
 - (ii) The name, address, TIN (if any), and chapter 4 status of every individual and specified U.S. person that owns a debt interest in the owner-documented FFI (including any indirect debt interest, which includes debt interests in any entity that directly or indirectly owns the payee or any direct or indirect equity interest in a debt holder of the payee) that constitutes a financial account in excess of \$50,000 (disregarding all such debt interests owned by participating FFIs, registered deemed-compliant FFIs, certified deemed-compliant FFIs, excepted NFFEs, exempt beneficial owners, or U.S. persons other than specified U.S. persons); **and**
 - (iii) Any additional information the withholding agent requests in order to fulfill its obligations with respect to the entity.
- Has provided, or will provide, valid documentation meeting the requirements of Regulations section 1.1471-3(d)(6)(ii) for each person identified in the FFI owner reporting statement.

c I certify that the FFI identified in Part I has provided, or will provide, an auditor's letter, signed within 4 years of the date of payment, from an independent accounting firm or legal representative with a location in the United States stating that the firm or representative has reviewed the FFI's documentation with respect to all of its owners and debt holders identified in Regulations section 1.1471-3(d)(6)(iv)(A)(2), and that the FFI meets all the requirements to be an owner-documented FFI. The FFI identified in Part I has also provided, or will provide, an FFI owner reporting statement of its owners that are specified U.S. persons and Form(s) W-9, with applicable waivers.

Check box 24d if applicable (optional, see instructions).

d I certify that the entity identified on line 1 is a trust that does not have any contingent beneficiaries or designated classes with unidentified beneficiaries.

Part XI Restricted Distributor

25a (All restricted distributors check here) I certify that the entity identified in Part I:

- Operates as a distributor with respect to debt or equity interests of the restricted fund with respect to which this form is furnished;
- Provides investment services to at least 30 customers unrelated to each other and less than half of its customers are related to each other;
- Is required to perform AML due diligence procedures under the anti-money laundering laws of its country of organization (which is an FATF-compliant jurisdiction);
- Operates solely in its country of incorporation or organization, has no fixed place of business outside of that country, and has the same country of incorporation or organization as all members of its affiliated group, if any;
- Does not solicit customers outside its country of incorporation or organization;
- Has no more than \$175 million in total assets under management and no more than \$7 million in gross revenue on its income statement for the most recent accounting year;
- Is not a member of an expanded affiliated group that has more than \$500 million in total assets under management or more than \$20 million in gross revenue for its most recent accounting year on a combined or consolidated income statement; **and**
- Does not distribute any debt or securities of the restricted fund to specified U.S. persons, passive NFFEs with one or more substantial U.S. owners, or nonparticipating FFIs.

Check box 25b or 25c, whichever applies.

I further certify that with respect to all sales of debt or equity interests in the restricted fund with respect to which this form is furnished that are made after December 31, 2011, the entity identified in Part I:

b Has been bound by a distribution agreement that contained a general prohibition on the sale of debt or securities to U.S. entities and U.S. resident individuals and is currently bound by a distribution agreement that contains a prohibition of the sale of debt or securities to any specified U.S. person, passive NFFE with one or more substantial U.S. owners, or nonparticipating FFI.

c Is currently bound by a distribution agreement that contains a prohibition on the sale of debt or securities to any specified U.S. person, passive NFFE with one or more substantial U.S. owners, or nonparticipating FFI and, for all sales made prior to the time that such a restriction was included in its distribution agreement, has reviewed all accounts related to such sales in accordance with the procedures identified in Regulations section 1.1471-4(c) applicable to preexisting accounts and has redeemed or retired any, or caused the restricted fund to transfer the securities to a distributor that is a participating FFI or reporting Model 1 FFI securities which were sold to specified U.S. persons, passive NFFEs with one or more substantial U.S. owners, or nonparticipating FFIs.

Part XII Nonreporting IGA FFI26 I certify that the entity identified in Part I:

- Meets the requirements to be considered a nonreporting financial institution pursuant to an applicable IGA between the United States and _____. The applicable IGA is a Model 1 IGA or a Model 2 IGA; and is treated as a _____ under the provisions of the applicable IGA or Treasury regulations (if applicable, see instructions);
- If you are a trustee documented trust or a sponsored entity, provide the name of the trustee or sponsor _____.

The trustee is: U.S. Foreign

Part XIII Foreign Government, Government of a U.S. Possession, or Foreign Central Bank of Issue27 I certify that the entity identified in Part I is the beneficial owner of the payment, and is not engaged in commercial financial activities of a type engaged in by an insurance company, custodial institution, or depository institution with respect to the payments, accounts, or obligations for which this form is submitted (except as permitted in Regulations section 1.1471-6(h)(2)).**Part XIV International Organization**

Check box 28a or 28b, whichever applies.

28a I certify that the entity identified in Part I is an international organization described in section 7701(a)(18).b I certify that the entity identified in Part I:

- Is comprised primarily of foreign governments;
- Is recognized as an intergovernmental or supranational organization under a foreign law similar to the International Organizations Immunities Act or that has in effect a headquarters agreement with a foreign government;
- The benefit of the entity's income does not inure to any private person; **and**
- Is the beneficial owner of the payment and is not engaged in commercial financial activities of a type engaged in by an insurance company, custodial institution, or depository institution with respect to the payments, accounts, or obligations for which this form is submitted (except as permitted in Regulations section 1.1471-6(h)(2)).

Part XV Exempt Retirement Plans

Check box 29a, b, c, d, e, or f, whichever applies.

29a I certify that the entity identified in Part I:

- Is established in a country with which the United States has an income tax treaty in force (see Part III if claiming treaty benefits);
- Is operated principally to administer or provide pension or retirement benefits; **and**
- Is entitled to treaty benefits on income that the fund derives from U.S. sources (or would be entitled to benefits if it derived any such income) as a resident of the other country which satisfies any applicable limitation on benefits requirement.

b I certify that the entity identified in Part I:

- Is organized for the provision of retirement, disability, or death benefits (or any combination thereof) to beneficiaries that are former employees of one or more employers in consideration for services rendered;
- No single beneficiary has a right to more than 5% of the FFI's assets;
- Is subject to government regulation and provides annual information reporting about its beneficiaries to the relevant tax authorities in the country in which the fund is established or operated; **and**

(i) Is generally exempt from tax on investment income under the laws of the country in which it is established or operates due to its status as a retirement or pension plan;

(ii) Receives at least 50% of its total contributions from sponsoring employers (disregarding transfers of assets from other plans described in this part, retirement and pension accounts described in an applicable Model 1 or Model 2 IGA, other retirement funds described in an applicable Model 1 or Model 2 IGA, or accounts described in Regulations section 1.1471-5(b)(2)(i)(A));

(iii) Either does not permit or penalizes distributions or withdrawals made before the occurrence of specified events related to retirement, disability, or death (except rollover distributions to accounts described in Regulations section 1.1471-5(b)(2)(i)(A) (referring to retirement and pension accounts), to retirement and pension accounts described in an applicable Model 1 or Model 2 IGA, or to other retirement funds described in this part or in an applicable Model 1 or Model 2 IGA); **or**

(iv) Limits contributions by employees to the fund by reference to earned income of the employee or may not exceed \$50,000 annually.

c I certify that the entity identified in Part I:

- Is organized for the provision of retirement, disability, or death benefits (or any combination thereof) to beneficiaries that are former employees of one or more employers in consideration for services rendered;
- Has fewer than 50 participants;
- Is sponsored by one or more employers each of which is not an investment entity or passive NFFE;
- Employee and employer contributions to the fund (disregarding transfers of assets from other plans described in this part, retirement and pension accounts described in an applicable Model 1 or Model 2 IGA, or accounts described in Regulations section 1.1471-5(b)(2)(i)(A)) are limited by reference to earned income and compensation of the employee, respectively;
- Participants that are not residents of the country in which the fund is established or operated are not entitled to more than 20% of the fund's assets; **and**
- Is subject to government regulation and provides annual information reporting about its beneficiaries to the relevant tax authorities in the country in which the fund is established or operates.

Part XV Exempt Retirement Plans (continued)

d I certify that the entity identified in Part I is formed pursuant to a pension plan that would meet the requirements of section 401(a), other than the requirement that the plan be funded by a trust created or organized in the United States.

e I certify that the entity identified in Part I is established exclusively to earn income for the benefit of one or more retirement funds described in this part or in an applicable Model 1 or Model 2 IGA, or accounts described in Regulations section 1.1471-5(b)(2)(i)(A) (referring to retirement and pension accounts), or retirement and pension accounts described in an applicable Model 1 or Model 2 IGA.

f I certify that the entity identified in Part I:

- Is established and sponsored by a foreign government, international organization, central bank of issue, or government of a U.S. possession (each as defined in Regulations section 1.1471-6) or an exempt beneficial owner described in an applicable Model 1 or Model 2 IGA to provide retirement, disability, or death benefits to beneficiaries or participants that are current or former employees of the sponsor (or persons designated by such employees); or
- Is established and sponsored by a foreign government, international organization, central bank of issue, or government of a U.S. possession (each as defined in Regulations section 1.1471-6) or an exempt beneficial owner described in an applicable Model 1 or Model 2 IGA to provide retirement, disability, or death benefits to beneficiaries or participants that are not current or former employees of such sponsor, but are in consideration of personal services performed for the sponsor.

Part XVI Entity Wholly Owned by Exempt Beneficial Owners

30 I certify that the entity identified in Part I:

- Is an FFI solely because it is an investment entity;
- Each direct holder of an equity interest in the investment entity is an exempt beneficial owner described in Regulations section 1.1471-6 or in an applicable Model 1 or Model 2 IGA;
- Each direct holder of a debt interest in the investment entity is either a depository institution (with respect to a loan made to such entity) or an exempt beneficial owner described in Regulations section 1.1471-6 or an applicable Model 1 or Model 2 IGA;
- Has provided an owner reporting statement that contains the name, address, TIN (if any), chapter 4 status, and a description of the type of documentation provided to the withholding agent for every person that owns a debt interest constituting a financial account or direct equity interest in the entity; and
- Has provided documentation establishing that every owner of the entity is an entity described in Regulations section 1.1471-6(b), (c), (d), (e), (f) and/or (g) without regard to whether such owners are beneficial owners.

Part XVII Territory Financial Institution

31 I certify that the entity identified in Part I is a financial institution (other than an investment entity) that is incorporated or organized under the laws of a possession of the United States.

Part XVIII Excepted Nonfinancial Group Entity

32 I certify that the entity identified in Part I:

- Is a holding company, treasury center, or captive finance company and substantially all of the entity's activities are functions described in Regulations section 1.1471-5(e)(5)(i)(C) through (E);
- Is a member of a nonfinancial group described in Regulations section 1.1471-5(e)(5)(i)(B);
- Is not a depository or custodial institution (other than for members of the entity's expanded affiliated group); and
- Does not function (or hold itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle with an investment strategy to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes.

Part XIX Excepted Nonfinancial Start-Up Company

33 I certify that the entity identified in Part I:

- Was formed on (or, in the case of a new line of business, the date of board resolution approving the new line of business) _____ (date must be less than 24 months prior to date of payment);
- Is not yet operating a business and has no prior operating history or is investing capital in assets with the intent to operate a new line of business other than that of a financial institution or passive NFFE;
- Is investing capital into assets with the intent to operate a business other than that of a financial institution; and
- Does not function (or hold itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes.

Part XX Excepted Nonfinancial Entity in Liquidation or Bankruptcy

34 I certify that the entity identified in Part I:

- Filed a plan of liquidation, filed a plan of reorganization, or filed for bankruptcy on _____;
- During the past 5 years has not been engaged in business as a financial institution or acted as a passive NFFE;
- Is either liquidating or emerging from a reorganization or bankruptcy with the intent to continue or recommence operations as a nonfinancial entity; and
- Has, or will provide, documentary evidence such as a bankruptcy filing or other public documentation that supports its claim if it remains in bankruptcy or liquidation for more than 3 years.

Part XXI 501(c) Organization35 I certify that the entity identified in Part I is a 501(c) organization that:

- Has been issued a determination letter from the IRS that is currently in effect concluding that the payee is a section 501(c) organization that is dated _____; or
- Has provided a copy of an opinion from U.S. counsel certifying that the payee is a section 501(c) organization (without regard to whether the payee is a foreign private foundation).

Part XXII Nonprofit Organization36 I certify that the entity identified in Part I is a nonprofit organization that meets the following requirements.

- The entity is established and maintained in its country of residence exclusively for religious, charitable, scientific, artistic, cultural or educational purposes;
- The entity is exempt from income tax in its country of residence;
- The entity has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
- Neither the applicable laws of the entity's country of residence nor the entity's formation documents permit any income or assets of the entity to be distributed to, or applied for the benefit of, a private person or noncharitable entity other than pursuant to the conduct of the entity's charitable activities or as payment of reasonable compensation for services rendered or payment representing the fair market value of property which the entity has purchased; and
- The applicable laws of the entity's country of residence or the entity's formation documents require that, upon the entity's liquidation or dissolution, all of its assets be distributed to an entity that is a foreign government, an integral part of a foreign government, a controlled entity of a foreign government, or another organization that is described in this part or escheats to the government of the entity's country of residence or any political subdivision thereof.

Part XXIII Publicly Traded NFFE or NFFE Affiliate of a Publicly Traded Corporation

Check box 37a or 37b, whichever applies.

37a I certify that:

- The entity identified in Part I is a foreign corporation that is not a financial institution; and
- The stock of such corporation is regularly traded on one or more established securities markets, including _____ (name one securities exchange upon which the stock is regularly traded).

b I certify that:

- The entity identified in Part I is a foreign corporation that is not a financial institution;
- The entity identified in Part I is a member of the same expanded affiliated group as an entity the stock of which is regularly traded on an established securities market;
- The name of the entity, the stock of which is regularly traded on an established securities market, is _____; and
- The name of the securities market on which the stock is regularly traded is _____.

Part XXIV Excepted Territory NFFE38 I certify that:

- The entity identified in Part I is an entity that is organized in a possession of the United States;
- The entity identified in Part I:
 - (i) Does not accept deposits in the ordinary course of a banking or similar business;
 - (ii) Does not hold, as a substantial portion of its business, financial assets for the account of others; or
 - (iii) Is not an insurance company (or the holding company of an insurance company) that issues or is obligated to make payments with respect to a financial account; and
- All of the owners of the entity identified in Part I are bona fide residents of the possession in which the NFFE is organized or incorporated.

Part XXV Active NFFE39 I certify that:

- The entity identified in Part I is a foreign entity that is not a financial institution;
- Less than 50% of such entity's gross income for the preceding calendar year is passive income; and
- Less than 50% of the assets held by such entity are assets that produce or are held for the production of passive income (calculated as a weighted average of the percentage of passive assets measured quarterly) (see instructions for the definition of passive income).

Part XXVI Passive NFFE40a I certify that the entity identified in Part I is a foreign entity that is not a financial institution (other than an investment entity organized in a possession of the United States) and is not certifying its status as a publicly traded NFFE (or affiliate), excepted territory NFFE, active NFFE, direct reporting NFFE, or sponsored direct reporting NFFE.

Check box 40b or 40c, whichever applies.

b I further certify that the entity identified in Part I has no substantial U.S. owners (or, if applicable, no controlling U.S. persons); orc I further certify that the entity identified in Part I has provided the name, address, and TIN of each substantial U.S. owner (or, if applicable, controlling U.S. person) of the NFFE in Part XXIX.

Part XXVII Excepted Inter-Affiliate FFI

41 I certify that the entity identified in Part I:

- Is a member of an expanded affiliated group;
- Does not maintain financial accounts (other than accounts maintained for members of its expanded affiliated group);
- Does not make withholdable payments to any person other than to members of its expanded affiliated group;
- Does not hold an account (other than depository accounts in the country in which the entity is operating to pay for expenses) with or receive payments from any withholding agent other than a member of its expanded affiliated group; and
- Has not agreed to report under Regulations section 1.1471-4(d)(2)(ii)(C) or otherwise act as an agent for chapter 4 purposes on behalf of any financial institution, including a member of its expanded affiliated group.

Part XXVIII Sponsored Direct Reporting NFFE (see instructions for when this is permitted)

42 Name of sponsoring entity:

43 I certify that the entity identified in Part I is a direct reporting NFFE that is sponsored by the entity identified on line 42.

Part XXIX Substantial U.S. Owners of Passive NFFE

As required by Part XXVI, provide the name, address, and TIN of each substantial U.S. owner of the NFFE. Please see the instructions for a definition of substantial U.S. owner. If providing the form to an FFI treated as a reporting Model 1 FFI or reporting Model 2 FFI, an NFFE may also use this part for reporting its controlling U.S. persons under an applicable IGA.

Part XXX | Certification

Under penalties of perjury, I declare that I have examined the information on this form and to the best of my knowledge and belief it is true, correct, and complete. I further certify under penalties of perjury that:

- The entity identified on line 1 of this form is the beneficial owner of all the income to which this form relates, is using this form to certify its status for chapter 4 purposes, or is a merchant submitting this form for purposes of section 6050W;
- The entity identified on line 1 of this form is not a U.S. person;
- The income to which this form relates is: (a) not effectively connected with the conduct of a trade or business in the United States, (b) effectively connected but is not subject to tax under an income tax treaty, or (c) the partner's share of a partnership's effectively connected income; **and**
- For broker transactions or barter exchanges, the beneficial owner is an exempt foreign person as defined in the instructions.

Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the income of which the entity on line 1 is the beneficial owner or any withholding agent that can disburse or make payments of the income of which the entity on line 1 is the beneficial owner.

I agree that I will submit a new form within 30 days if any certification on this form becomes incorrect.

Sign Here

Signature of individual authorized to sign for beneficial owner

Print Name

Date (MM-DD-YYYY)

I certify that I have the capacity to sign for the entity identified on line 1 of this form.

**Certificate of Foreign Intermediary, Foreign Flow-Through Entity, or Certain
U.S. Branches for United States Tax Withholding and Reporting**

► Section references are to the Internal Revenue Code.

► Go to www.irs.gov/FormW8IMY for instructions and the latest information.

► Give this form to the withholding agent or payer. Do not send to the IRS.

OMB No. 1545-1621

Do not use this form for:

- A beneficial owner solely claiming foreign status or treaty benefits (other than a qualified intermediary (QI) acting as a qualified derivatives dealer (QDD)) W-8BEN or W-8BEN-E
- A hybrid entity claiming treaty benefits on its own behalf (other than a QI acting as a QDD) W-8BEN-E
- A foreign person claiming that income is effectively connected with the conduct of a trade or business in the United States W-8ECI
- A disregarded entity with a single foreign owner that is the beneficial owner (other than a QI acting as a QDD) of the income to which this form relates. Instead, the single foreign owner should use W-8BEN, W-8ECI, or W-8BEN-E
- A foreign government, international organization, foreign central bank of issue, foreign tax-exempt organization, foreign private foundation, or government of a U.S. possession claiming the applicability of section(s) 115(2), 501(c), 892, 895, or 1443(b) W-8EXP
- U.S. entity or U.S. citizen or resident W-9
- A foreign person documenting itself for purposes of section 6050W W-8BEN, W-8BEN-E, or W-8ECI

Instead, use Form:

Part I Identification of Entity

1 Name of organization that is acting as intermediary

2 Country of incorporation or organization

3 Name of disregarded entity (if applicable), see instructions

4 Chapter 3 Status (entity type) (Must check one box only.):

<input type="checkbox"/> QI (including a QDD). Complete Part III.	<input type="checkbox"/> Withholding foreign trust. Complete Part VII.
<input type="checkbox"/> Nonqualified intermediary. Complete Part IV.	<input type="checkbox"/> Nonwithholding foreign partnership. Complete Part VIII.
<input type="checkbox"/> Territory financial institution. Complete Part V.	<input type="checkbox"/> Nonwithholding foreign simple trust. Complete Part VIII.
<input type="checkbox"/> U.S. branch. Complete Part VI.	<input type="checkbox"/> Nonwithholding foreign grantor trust. Complete Part VIII.
<input type="checkbox"/> Withholding foreign partnership. Complete Part VII.	

5 Chapter 4 Status (FATCA status) (See instructions for details and complete the certification below for the entity's applicable status.)
(Must check one box only.):

<input type="checkbox"/> Nonparticipating foreign financial institution (FFI) (including an FFI related to a Reporting IGA FFI other than a deemed-compliant FFI, participating FFI, or exempt beneficial owner). Complete Part IX (if applicable).	<input type="checkbox"/> Certain investment entities that do not maintain financial accounts. Complete Part XVI.
<input type="checkbox"/> Participating FFI.	<input type="checkbox"/> Owner-documented FFI. Complete Part XI.
<input type="checkbox"/> Reporting Model 1 FFI.	<input type="checkbox"/> Restricted distributor. Complete Part XVII.
<input type="checkbox"/> Reporting Model 2 FFI.	<input type="checkbox"/> Foreign central bank of issue. Complete Part XVIII.
<input type="checkbox"/> Registered deemed-compliant FFI (other than a reporting Model 1 FFI, sponsored FFI, or nonreporting IGA FFI covered in Part XIX).	<input type="checkbox"/> Nonreporting IGA FFI. Complete Part XIX.
<input type="checkbox"/> Territory financial institution. Complete Part V.	<input type="checkbox"/> Exempt retirement plans. Complete Part XX.
<input type="checkbox"/> Sponsored FFI (other than a certified deemed-compliant sponsored, closely held investment vehicle). Complete Part X.	<input type="checkbox"/> Excepted nonfinancial group entity. Complete Part XXI.
<input type="checkbox"/> Certified deemed-compliant nonregistering local bank. Complete Part XII.	<input type="checkbox"/> Excepted nonfinancial start-up company. Complete Part XXII.
<input type="checkbox"/> Certified deemed-compliant FFI with only low-value accounts. Complete Part XIII.	<input type="checkbox"/> Excepted nonfinancial entity in liquidation or bankruptcy. Complete Part XXIII.
<input type="checkbox"/> Certified deemed-compliant sponsored, closely held investment vehicle. Complete Part XIV.	<input type="checkbox"/> Publicly traded NFFE or NFFE affiliate of a publicly traded corporation. Complete Part XXIV.
<input type="checkbox"/> Certified deemed-compliant limited life debt investment entity. Complete Part XV.	<input type="checkbox"/> Excepted territory NFFE. Complete Part XXV.
	<input type="checkbox"/> Active NFFE. Complete Part XXVI.
	<input type="checkbox"/> Passive NFFE. Complete Part XXVII.
	<input type="checkbox"/> Direct reporting NFFE.
	<input type="checkbox"/> Sponsored direct reporting NFFE. Complete Part XXVIII.

6 Permanent residence address (street, apt. or suite no., or rural route). **Do not use a P.O. box or in-care-of address** (other than a registered address).

City or town, state or province. Include postal code where appropriate.

Country

7 Mailing address (if different from above)

City or town, state or province. Include postal code where appropriate.

Country

8 U.S. taxpayer identification number, if required ►

QI-EIN

WP-EIN

WT-EIN

EIN

9 GIIN (if applicable)

10 Reference number(s) (see instructions)

Part II Disregarded Entity or Branch Receiving Payment. (Complete only if a disregarded entity with a GIIN or a branch of an FFI in a country other than the FFI's country of residence. Do not complete Part II for QDD branches. See instructions.)

11 Chapter 4 Status (FATCA status) of disregarded entity or branch receiving payment.

Branch treated as nonparticipating FFI. Reporting Model 1 FFI. U.S. Branch.
 Participating FFI. Reporting Model 2 FFI.

12 Address of branch (street, apt. or suite no., or rural route). **Do not use a P.O. box or in-care-of address** (other than a registered address).

City or town, state or province. Include postal code where appropriate.

Country

13 GIIN (if any) ►

Chapter 3 Status Certifications

Part III Qualified Intermediary

All Qualified Intermediaries

14 I certify that the entity identified in Part I (or branch, if relevant):

- Is a QI with respect to the accounts identified on line 10 or in a withholding statement associated with this form (as required) that is one or more of the following:
 - (i) not acting for its own account;
 - (ii) a QDD receiving payments on underlying securities and/or potential section 871(m) transactions;
 - (iii) a QI assuming primary withholding responsibility for payments of substitute interest, as permitted by the QI Agreement.
- Has provided or will provide a withholding statement (as required) for purposes of chapters 3 and 4 that is subject to the certifications made on this form.

Qualified Intermediaries not Acting as Qualified Derivatives Dealers (check all that apply)

15a I certify that the entity identified in Part I of this form assumes primary withholding responsibility for purposes of chapters 3 and 4 for each account identified on a withholding statement attached to this form (or, if no withholding statement is attached to this form, for all accounts).

b I certify that the entity identified in Part I of this form assumes primary Form 1099 reporting and backup withholding responsibility or reporting responsibility as a participating FFI or registered deemed-compliant FFI with respect to accounts that it maintains that are held by specified U.S. persons as permitted under Regulations sections 1.6049-4(c)(4)(i) or (c)(4)(ii) in lieu of Form 1099 reporting for each account identified on a withholding statement attached to this form (or, if no withholding statement is attached to this form, for all accounts).

c I certify that the entity identified in Part I of this form does not assume primary Form 1099 reporting and backup withholding responsibility.

d (Complete only to the extent the entity identified in Part I of this form does not assume primary Form 1099 reporting and backup withholding responsibility.) If the entity identified in Part I of this form has allocated or will allocate a portion of a payment to a chapter 4 withholding rate pool of U.S. payees on a withholding statement associated with this form, I certify that the entity meets the requirements of Regulations section 1.6049-4(c)(4)(iii) with respect to any account holder of an account it maintains that is included in such a withholding rate pool.

e (Complete only to the extent the entity identified in Part I of this form does not assume primary Form 1099 reporting and backup withholding responsibility.) If the entity identified in Part I of this form has allocated or will allocate a portion of a payment to a chapter 4 withholding rate pool of U.S. payees on a withholding statement associated with this form, to the extent the U.S. payees are account holders of an intermediary or flow-through entity receiving a payment from the entity, I certify that the entity has obtained, or will obtain, documentation sufficient to establish each such intermediary or flow-through entity status as a participating FFI, registered deemed-compliant FFI, or FFI that is a QI.

f I certify that the entity identified in Part I of this form is acting as a qualified securities lender with respect to payments associated with this form that are U.S. source substitute dividends received from the withholding agent.

g I certify that the entity identified in Part I of this form assumes primary withholding responsibility for purposes of chapters 3 and 4 and primary Form 1099 reporting and backup withholding responsibility for all payments of substitute interest associated with this form, as permitted by the QI Agreement.

Qualified Derivatives Dealers

16a I certify that each QDD identified in Part I of this form or on a withholding statement associated with this form meets the requirements to act as a QDD and assumes primary withholding and reporting responsibilities under chapters 3, 4, and 61 and section 3406 with respect to any payments it makes with respect to potential section 871(m) transactions.

b Entity classification of QDD:

Corporation

Partnership

Disregarded Entity

Part IV Nonqualified Intermediary**Check all that apply.**

17a (All nonqualified intermediaries and QIs that are not acting in their capacity as such check here.) I certify that the entity identified in Part I of this form is not acting as a qualified intermediary with respect to each account(s) for which this form is provided and is not acting for its own account.

b I certify that the entity identified in Part I of this form is using this form to transmit withholding certificates and/or other documentation and has provided, or will provide, a withholding statement, as required.

c I certify that the entity identified in Part I of this form meets the requirements of Regulations section 1.6049-4(c)(4)(iii) with respect to any account holder of an account it maintains that is included in a withholding rate pool of U.S. payees provided on a withholding statement associated with this form.

d I certify that the entity identified in Part I of this form is acting as a qualified securities lender with respect to payments associated with this form that are U.S. source substitute dividends received from the withholding agent.

Part V Territory Financial Institution

18a I certify that the entity identified in Part I is a financial institution (other than an investment entity that is not also a depository institution, custodial institution, or specified insurance company) that is incorporated or organized under the laws of a possession of the United States.

Check box 18b or 18c, whichever applies.

b I further certify that the entity identified in Part I is using this form as evidence of its agreement with the withholding agent to be treated as a U.S. person for purposes of chapters 3 and 4 with respect to any payments associated with this withholding certificate.

c I further certify that the entity identified in Part I:

- Is using this form to transmit withholding certificates and/or other documentation for the persons for whom it receives a payment; **and**
- Has provided or will provide a withholding statement, as required.

Part VI Certain U.S. Branches

19a I certify that the entity identified in Part I is receiving payments that are not effectively connected with the conduct of a trade or business in the United States.

Check box 19b or 19c, whichever applies.

b I certify that the entity identified in Part I is a U.S. branch of a foreign bank or insurance company described in Regulations section 1.1441-1(b)(2)(iv)(A) that is using this form as evidence of its agreement with the withholding agent to be treated as a U.S. person with respect to any payments associated with this withholding certificate.

c I certify that the entity identified in Part I:

- Is using this form to transmit withholding certificates and/or other documentation for the persons for whom the branch receives a payment;
- Has provided or will provide a withholding statement, as required; **and**
- In the case of a withholdable payment, is applying the rules described in Regulations section 1.1471-4(d)(2)(iii)(C).

Part VII Withholding Foreign Partnership (WP) or Withholding Foreign Trust (WT)

20 I certify that the entity identified in Part I is a withholding foreign partnership or a withholding foreign trust that is compliant with the terms of its WP or WT agreement.

Part VIII Nonwithholding Foreign Partnership, Simple Trust, or Grantor Trust**Check all that apply.**

21a I certify that the entity identified in Part I:

- Is a nonwithholding foreign partnership, a nonwithholding foreign simple trust, or a nonwithholding foreign grantor trust and is providing this form for payments that are not effectively connected, or are not treated as effectively connected, with the conduct of a trade or business in the United States; **and**
- Is using this form to transmit withholding certificates and/or other documentation and has provided or will provide a withholding statement, as required for purposes of chapters 3 and 4, that is subject to the certifications made on this form.

b I certify that the entity identified in Part I is a foreign partnership that is a partner in a lower-tier partnership and is providing this Form W-8IMY for purposes of section 1446.

Chapter 4 Status Certifications

Part IX Nonparticipating FFI with Exempt Beneficial Owners

22 I certify that the entity identified in Part I is using this form to transmit withholding certificates and/or other documentation and has provided or will provide a withholding statement that indicates the portion of the payment allocated to one or more exempt beneficial owners.

Part X Sponsored FFI

23a Name of sponsoring entity: ►

Check box 23b or 23c, whichever applies.

b I certify that the entity identified in Part I:

- Is an investment entity;
- Is not a QI, WP (except to the extent permitted in the withholding foreign partnership agreement), or WT; **and**
- Has agreed with the entity identified above (that is not a nonparticipating FFI) to act as the sponsoring entity for this entity.

c I certify that the entity identified in Part I:

- Is a controlled foreign corporation as defined in section 957(a);
- Is not a QI, WP, or WT;
- Is wholly owned, directly or indirectly, by the U.S. financial institution identified above that agrees to act as the sponsoring entity for this entity; **and**
- Shares a common electronic account system with the sponsoring entity (identified above) that enables the sponsoring entity to identify all account holders and payees of the entity and to access all account and customer information maintained by the entity including, but not limited to, customer identification information, customer documentation, account balance, and all payments made to account holders or payees.

Part XI Owner-Documented FFI

Note: This status only applies if the U.S. financial institution, participating FFI, reporting Model 1 FFI, or reporting Model 2 FFI to which this form is given has agreed that it will treat the FFI as an owner-documented FFI. The owner-documented FFI must make the certifications below.

24a I certify that the FFI identified in Part I:

- Does not act as an intermediary;
- Does not accept deposits in the ordinary course of a banking or similar business;
- Does not hold, as a substantial portion of its business, financial assets for the account of others;
- Is not an insurance company (or the holding company of an insurance company) that issues or is obligated to make payments with respect to a financial account;
- Is not affiliated with an entity (other than an FFI that is also treated as an owner-documented FFI) that accepts deposits in the ordinary course of a banking or similar business, holds, as a substantial portion of its business, financial assets for the account of others, or is an insurance company (or the holding company of an insurance company) that issues or is obligated to make payments with respect to a financial account; **and**
- Does not maintain a financial account for any nonparticipating FFI.

Check box 24b or 24c, whichever applies.

b I certify that the FFI identified in Part I:

- Has provided, or will provide, an FFI owner reporting statement (including any applicable owner documentation) that contains:
 - (i) The name, address, TIN (if any), chapter 4 status, and type of documentation provided (if required) of every individual and specified U.S. person that owns a direct or indirect equity interest in the owner-documented FFI (looking through all entities other than specified U.S. persons);
 - (ii) The name, address, TIN (if any), chapter 4 status, and type of documentation provided (if required) of every individual and specified U.S. person that owns a debt interest in the owner-documented FFI (including any indirect debt interest, which includes debt interests in any entity that directly or indirectly owns the payee or any direct or indirect equity interest in a debt holder of the payee) that constitutes a financial account in excess of \$50,000 (disregarding all such debt interests owned by participating FFIs, registered deemed-compliant FFIs, certified deemed-compliant FFIs, excepted NFFEIs, exempt beneficial owners, or U.S. persons other than specified U.S. persons); **and**
 - (iii) Any additional information the withholding agent requests in order to fulfill its obligations with respect to the entity.

c I certify that the FFI identified in Part I:

- Has provided, or will provide, an auditor's letter, signed no more than 4 years prior to the date of payment, from an independent accounting firm or legal representative with a location in the United States stating that the firm or representative has reviewed the FFI's documentation with respect to all of its owners and debt holders identified in Regulations section 1.1471-3(d)(6)(iv)(A)(2) and that the FFI meets all the requirements to be an owner-documented FFI. The FFI identified in Part I has also provided, or will provide, an FFI owner reporting statement and Form W-9, with applicable waivers, as described in Regulations section 1.1471-3(d)(6)(iv).

Part XII Certified Deemed-Compliant Nonregistering Local Bank

25 I certify that the FFI identified in Part I:

- Operates and is licensed solely as a bank or credit union (or similar cooperative credit organization operated without profit) in its country of incorporation or organization;
- Engages primarily in the business of receiving deposits from and making loans to, with respect to a bank, retail customers unrelated to such bank and, with respect to a credit union or similar cooperative credit organization, members, provided that no member has a greater than 5% interest in such credit union or cooperative credit organization;
- Does not solicit account holders outside its country of organization;
- Has no fixed place of business outside such country (for this purpose, a fixed place of business does not include a location that is not advertised to the public and from which the FFI performs solely administrative support functions);
- Has no more than \$175 million in assets on its balance sheet and, if it is a member of an expanded affiliated group, the group has no more than \$500 million in total assets on its consolidated or combined balance sheets; **and**
- Does not have any member of its expanded affiliated group that is an FFI, other than an FFI that is incorporated or organized in the same country as the FFI identified in Part I and that meets the requirements set forth in this Part XII.

Part XIII Certified Deemed-Compliant FFI With Only Low-Value Accounts

26 I certify that the FFI identified in Part I:

- Is not engaged primarily in the business of investing, reinvesting, or trading in securities, partnership interests, commodities, notional principal contracts, insurance or annuity contracts, or any interest (including a futures or forward contract or option) in such security, partnership interest, commodity, notional principal contract, insurance contract, or annuity contract;
- No financial account maintained by the FFI or any member of its expanded affiliated group, if any, has a balance or value in excess of \$50,000 (as determined after applying applicable account aggregation rules); **and**
- Neither the FFI nor the FFI's entire expanded affiliated group, if any, has more than \$50 million in assets on its consolidated or combined balance sheet as of the end of its most recent accounting year.

Part XIV Certified Deemed-Compliant Sponsored, Closely Held Investment Vehicle

27a Name of sponsoring entity: ► _____

b I certify that the FFI identified in Part I:

- Is an FFI solely because it is an investment entity described in Regulations section 1.1471-5(e)(4);
- Is not a QI, WP, or WT;
- Will have all of its due diligence, withholding, and reporting responsibilities (determined as if the FFI were a participating FFI) fulfilled by the sponsoring entity identified on line 27a; **and**
- 20 or fewer individuals own all of the debt and equity interests in the entity (disregarding debt interests owned by U.S. financial institutions, participating FFIs, registered deemed-compliant FFIs, and certified deemed-compliant FFIs and equity interests owned by an entity that owns 100% of the equity interests in the FFI identified in Part I and is itself a sponsored FFI).

Part XV Certified Deemed-Compliant Limited Life Debt Investment Entity

28 I certify that the FFI identified in Part I:

- Was in existence as of January 17, 2013;
- Issued all classes of its debt or equity interests to investors on or before January 17, 2013, pursuant to a trust indenture or similar agreement; **and**
- Is certified deemed-compliant because it satisfies the requirements to be treated as a limited life debt investment entity (such as the restrictions with respect to its assets and other requirements under Regulations section 1.1471-5(f)(2)(iv)).

Part XVI Certain Investment Entities That Do Not Maintain Financial Accounts

29 I certify that the entity identified in Part I:

- Is a financial institution solely because it is an investment entity described in Regulations section 1.1471-5(e)(4)(i)(A); **and**
- Does not maintain financial accounts.

Part XVII Restricted Distributor

30a (All restricted distributors check here.) I certify that the entity identified in Part I:

- Operates as a distributor with respect to debt or equity interests of the restricted fund with respect to which this form is furnished;
- Provides investment services to at least 30 customers unrelated to each other and less than half of its customers are related to each other;
- Is required to perform AML due diligence procedures under the anti-money laundering laws of its country of organization (which is a FATF-compliant jurisdiction);
- Operates solely in its country of incorporation or organization, has no fixed place of business outside of that country, and has the same country of incorporation or organization as all members of its affiliated group, if any;
- Does not solicit customers outside its country of incorporation or organization;
- Has no more than \$175 million in total assets under management and no more than \$7 million in gross revenue on its income statement for the most recent accounting year;
- Is not a member of an expanded affiliated group that has more than \$500 million in total assets under management or more than \$20 million in gross revenue for its most recent accounting year on a combined or consolidated income statement; **and**
- Does not distribute any debt or securities of the restricted fund to specified U.S. persons, passive NFFEs with one or more substantial U.S. owners, or nonparticipating FFIs.

Part XVII Restricted Distributor (continued)**Check box 30b or 30c, whichever applies.**

I further certify that with respect to all sales of debt or equity interests in the restricted fund with respect to which this form is furnished that are made after December 31, 2011, the entity identified in Part I:

- b Has been bound by a distribution agreement that contained a general prohibition on the sale of debt or securities to U.S. entities and U.S. resident individuals and is currently bound by a distribution agreement that contains a prohibition of the sale of debt or securities to any specified U.S. person, passive NFFE with one or more substantial U.S. owners, or nonparticipating FFI.
- c Is currently bound by a distribution agreement that contains a prohibition on the sale of debt or securities to any specified U.S. person, passive NFFE with one or more substantial U.S. owners, or nonparticipating FFI and, for all sales made prior to the time that such a restriction was included in its distribution agreement, has reviewed all accounts related to such sales in accordance with the procedures identified in Regulations section 1.1471-4(c) applicable to preexisting accounts and has redeemed or retired any securities which were sold to specified U.S. persons, passive NFFEs with one or more substantial U.S. owners, or nonparticipating FFIs, or will transfer the securities to a distributor that is a participating FFI, reporting Model 1 FFI, or reporting Model 2 FFI.

Part XVIII Foreign Central Bank of Issue

31 I certify that the entity identified in Part I is treated as the beneficial owner of the payment solely for purposes of chapter 4 under Regulations section 1.1471-6(d)(4).

Part XIX Nonreporting IGA FFI

32 I certify that the entity identified in Part I:

- Meets the requirements to be considered a nonreporting financial institution pursuant to an applicable IGA between the United States and _____. The applicable IGA is a Model 1 IGA or a Model 2 IGA; and is treated as a _____ under the provisions of the applicable IGA or Treasury regulations (if applicable, see instructions); and
- If you are a trustee documented trust or sponsored entity, provide the name of the trustee or sponsor _____ The trustee is: U.S. Foreign _____

Part XX Exempt Retirement Plans**Check box 33a, b, c, d, e, or f, whichever applies.**

33a I certify that the entity identified in Part I:

- Is established in a country with which the United States has an income tax treaty in force;
- Is operated principally to administer or provide pension or retirement benefits; and
- Is entitled to treaty benefits on income that the fund derives from U.S. sources (or would be entitled to benefits if it derived any such income) as a resident of the other country which satisfies any applicable limitation on benefits requirement.

b I certify that the entity identified in Part I:

- Is organized for the provision of retirement, disability, or death benefits (or any combination thereof) to beneficiaries that are former employees of one or more employers in consideration for services rendered;
- No single beneficiary has a right to more than 5% of the FFI's assets;
- Is subject to government regulation and provides annual information reporting about its beneficiaries to the relevant tax authorities in the country in which the fund is established or operated; and
- (i) Is generally exempt from tax on investment income under the laws of the country in which it is established or operates due to its status as a retirement or pension plan;
- (ii) Receives at least 50% of its total contributions from sponsoring employers (disregarding transfers of assets from other plans described in this part, retirement and pension accounts described in an applicable Model 1 or Model 2 IGA, other retirement funds described in an applicable Model 1 or Model 2 IGA, or accounts described in Regulations section 1.1471-5(b)(2)(i)(A));
- (iii) Either does not permit or penalizes distributions or withdrawals made before the occurrence of specified events related to retirement, disability, or death (except rollover distributions to accounts described in Regulations section 1.1471-5(b)(2)(i)(A) (referring to retirement and pension accounts), to retirement and pension accounts described in an applicable Model 1 or Model 2 IGA, or to other retirement funds described in this part or in an applicable Model 1 or Model 2 IGA); or
- (iv) Limits contributions by employees to the fund by reference to earned income of the employee or may not exceed \$50,000 annually.

c I certify that the entity identified in Part I:

- Is organized for the provision of retirement, disability, or death benefits (or any combination thereof) to beneficiaries that are former employees of one or more employers in consideration for services rendered;
- Has fewer than 50 participants;
- Is sponsored by one or more employers, each of which is not an investment entity or passive NFFE;
- Employee and employer contributions to the fund (disregarding transfers of assets from other plans described in this part, retirement and pension accounts described in an applicable Model 1 or Model 2 IGA, or accounts described in Regulations section 1.1471-5(b)(2)(i)(A)) are limited by reference to earned income and compensation of the employee, respectively;
- Participants that are not residents of the country in which the fund is established or operated are not entitled to more than 20% of the fund's assets; and
- Is subject to government regulation and provides annual information reporting about its beneficiaries to the relevant tax authorities in the country in which the fund is established or operates.

d I certify that the entity identified in Part I is formed pursuant to a pension plan that would meet the requirements of section 401(a), other than the requirement that the plan be funded by a trust created or organized in the United States.

Part XX Exempt Retirement Plans (continued)

e I certify that the entity identified in Part I is established exclusively to earn income for the benefit of one or more retirement funds described in this part or in an applicable Model 1 or Model 2 IGA, accounts described in Regulations section 1.1471-5(b)(2)(i)(A) (referring to retirement and pension accounts), or retirement and pension accounts described in an applicable Model 1 or Model 2 IGA.

f I certify that the entity identified in Part I:

- Is established and sponsored by a foreign government, international organization, central bank of issue, or government of a U.S. possession (each as defined in Regulations section 1.1471-6) or an exempt beneficial owner described in an applicable Model 1 or Model 2 IGA to provide retirement, disability, or death benefits to beneficiaries or participants that are current or former employees of the sponsor (or persons designated by such employees); **or**
- Is established and sponsored by a foreign government, international organization, central bank of issue, or government of a U.S. possession (each as defined in Regulations section 1.1471-6) or an exempt beneficial owner described in an applicable Model 1 or Model 2 IGA to provide retirement, disability, or death benefits to beneficiaries or participants that are not current or former employees of such sponsor, but are in consideration of personal services performed for the sponsor.

Part XXI Excepted Nonfinancial Group Entity

34 I certify that the entity identified in Part I:

- Is a holding company, treasury center, or captive finance company and substantially all of the entity's activities are functions described in Regulations section 1.1471-5(e)(5)(i)(C) through (E);
- Is a member of a nonfinancial group described in Regulations section 1.1471-5(e)(5)(i)(B);
- Is not a depository or custodial institution (other than for members of the entity's expanded affiliated group); **and**
- Does not function (or hold itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle with an investment strategy to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes.

Part XXII Excepted Nonfinancial Start-Up Company

35 I certify that the entity identified in Part I:

- Was formed on (or in the case of a new line of business, the date of board resolution approving the new line of business) _____ (date must be less than 24 months prior to date of payment);
- Is not yet operating a business and has no prior operating history or is investing capital in assets with the intent to operate a new line of business other than that of a financial institution or passive NFFE; **and**
- Does not function (or hold itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes.

Part XXIII Excepted Nonfinancial Entity in Liquidation or Bankruptcy

36 I certify that the entity identified in Part I:

- Filed a plan of liquidation, filed a plan for reorganization, or filed for bankruptcy on the following date: _____;
- Has not been engaged during the past 5 years in business as a financial institution or acted as a passive NFFE;
- Is either liquidating or emerging from a reorganization or bankruptcy with the intent to continue or recommence operations as a nonfinancial entity; **and**
- Has provided, or will provide, documentary evidence such as a bankruptcy filing or other public documentation that supports its claim if it remains in bankruptcy or liquidation for more than 3 years.

Part XXIV Publicly Traded NFFE or NFFE Affiliate of a Publicly Traded Corporation

Check box 37a or 37b, whichever applies.

37a I certify that:

- The entity identified in Part I is a foreign corporation that is not a financial institution; **and**
- The stock of such corporation is regularly traded on one or more established securities markets, including _____.

b I certify that:

- The entity identified in Part I is a foreign corporation that is not a financial institution;
- The entity identified in Part I is a member of the same expanded affiliated group as an entity the stock of which is regularly traded on an established securities market;
- The name of the entity, the stock of which is regularly traded on an established securities market, is _____; **and**
- The name of the securities market on which the stock is regularly traded is ► _____.

Part XXV Excepted Territory NFFE

38 I certify that:

- The entity identified in Part I is an entity that is organized in a possession of the United States;
- All of the owners of the entity identified in Part I are bona fide residents of the possession in which the NFFE is organized or incorporated; **and**
- The entity identified in Part I:
 - (i) Does not accept deposits in the ordinary course of a banking or similar business;
 - (ii) Does not hold, as a substantial portion of its business, financial assets for the account of others; **and**
 - (iii) Is not an insurance company (or the holding company of an insurance company) that issues or is obligated to make payments with respect to a financial account.

Part XXVI Active NFFE39 I certify that:

- The entity identified in Part I is a foreign entity that is not a financial institution;
- Less than 50% of such entity's gross income for the preceding calendar year is passive income; **and**
- Less than 50% of the assets held by such entity are assets that produce or are held for the production of passive income (calculated as a weighted average of the percentage of passive assets measured quarterly). See the instructions for the definition of passive income.

Part XXVII Passive NFFE40 I certify that the entity identified in Part I:

- Is a foreign entity that is not a financial institution (this category includes an entity organized in a possession of the United States that engages (or holds itself out as being engaged) primarily in the business of investing, reinvesting, or trading in securities, partnership interests, commodities, notional principal contracts, insurance or annuity contracts, or any interest in such security, partnership interest, commodity, notional principal contract, insurance contract, or annuity contract); **and**
- Is using this form to transmit withholding certificates and/or other documentation and has provided or will provide a withholding statement, as required.

Part XXVIII Sponsored Direct Reporting NFFE

41 Name of sponsoring entity: ►

42 I certify that the entity identified in Part I is a direct reporting NFFE that is sponsored by the entity identified on line 41.**Part XXIX Certification**

Under penalties of perjury, I declare that I have examined the information on this form, and to the best of my knowledge and belief, it is true, correct, and complete. Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the income for which I am providing this form or any withholding agent that can disburse or make payments of the amounts for which I am providing this form.

I agree that I will submit a new form within 30 days if any certification made on this form becomes incorrect.

Sign Here

Signature of authorized official

Print Name

Date (MM-DD-YYYY)

Form W-8ECI

(Rev. July 2017)

Department of the Treasury
Internal Revenue Service**Certificate of Foreign Person's Claim That Income Is Effectively Connected With the Conduct of a Trade or Business in the United States**

OMB No. 1545-1621

- Section references are to the Internal Revenue Code.
- Go to www.irs.gov/FormW8ECI for instructions and the latest information.
- Give this form to the withholding agent or payer. Do not send to the IRS.

Note: Persons submitting this form must file an annual U.S. income tax return to report income claimed to be effectively connected with a U.S. trade or business. See instructions.

Do not use this form for:

- A beneficial owner solely claiming foreign status or treaty benefits
- A foreign government, international organization, foreign central bank of issue, foreign tax-exempt organization, foreign private foundation, or government of a U.S. possession claiming the applicability of section(s) 115(2), 501(c), 892, 895, or 1443(b)

Instead, use Form:

W-8BEN or W-8BEN-E

Note: These entities should use Form W-8ECI if they received effectively connected income and are not eligible to claim an exemption for chapter 3 or 4 purposes on Form W-8EXP.

- A foreign partnership or a foreign trust (unless claiming an exemption from U.S. withholding on income effectively connected with the conduct of a trade or business in the United States)
- A person acting as an intermediary

Note: See instructions for additional exceptions.

Part I Identification of Beneficial Owner (see instructions)

1 Name of individual or organization that is the beneficial owner	2 Country of incorporation or organization												
3 Name of disregarded entity receiving the payments (if applicable)													
4 Type of entity (check the appropriate box): <table style="margin-left: 20px;"> <tr> <td><input type="checkbox"/> Partnership</td> <td><input type="checkbox"/> Simple trust</td> <td><input type="checkbox"/> Individual</td> <td><input type="checkbox"/> Corporation</td> </tr> <tr> <td><input type="checkbox"/> Government</td> <td><input type="checkbox"/> Grantor trust</td> <td><input type="checkbox"/> Complex trust</td> <td><input type="checkbox"/> Estate</td> </tr> <tr> <td><input type="checkbox"/> Private foundation</td> <td><input type="checkbox"/> International organization</td> <td><input type="checkbox"/> Central bank of issue</td> <td><input type="checkbox"/> Tax-exempt organization</td> </tr> </table>		<input type="checkbox"/> Partnership	<input type="checkbox"/> Simple trust	<input type="checkbox"/> Individual	<input type="checkbox"/> Corporation	<input type="checkbox"/> Government	<input type="checkbox"/> Grantor trust	<input type="checkbox"/> Complex trust	<input type="checkbox"/> Estate	<input type="checkbox"/> Private foundation	<input type="checkbox"/> International organization	<input type="checkbox"/> Central bank of issue	<input type="checkbox"/> Tax-exempt organization
<input type="checkbox"/> Partnership	<input type="checkbox"/> Simple trust	<input type="checkbox"/> Individual	<input type="checkbox"/> Corporation										
<input type="checkbox"/> Government	<input type="checkbox"/> Grantor trust	<input type="checkbox"/> Complex trust	<input type="checkbox"/> Estate										
<input type="checkbox"/> Private foundation	<input type="checkbox"/> International organization	<input type="checkbox"/> Central bank of issue	<input type="checkbox"/> Tax-exempt organization										
5 Permanent residence address (street, apt. or suite no., or rural route). Do not use a P.O. box or in-care-of address.													
City or town, state or province. Include postal code where appropriate.													
6 Business address in the United States (street, apt. or suite no., or rural route). Do not use a P.O. box or in-care-of address.													
City or town, state, and ZIP code													
7 U.S. taxpayer identification number (required—see instructions)	8 Foreign tax identifying number												
<input type="checkbox"/> SSN or ITIN <input type="checkbox"/> EIN													
9 Reference number(s) (see instructions)	10 Date of birth (MM-DD-YYYY)												

11 Specify each item of income that is, or is expected to be, received from the payer that is effectively connected with the conduct of a trade or business in the United States (attach statement if necessary).

Part II Certification

Under penalties of perjury, I declare that I have examined the information on this form and to the best of my knowledge and belief it is true, correct, and complete. I further certify under penalties of perjury that:

- I am the beneficial owner (or I am authorized to sign for the beneficial owner) of all the payments to which this form relates,
- The amounts for which this certification is provided are effectively connected with the conduct of a trade or business in the United States,
- The income for which this form was provided is includible in my gross income (or the beneficial owner's gross income) for the taxable year, **and**
- The beneficial owner is not a U.S. person.

Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the payments of which I am the beneficial owner or any withholding agent that can disburse or make payments of the amounts of which I am the beneficial owner.

I agree that I will submit a new form within 30 days if any certification made on this form becomes incorrect.

Signature of beneficial owner (or individual authorized to sign for the beneficial owner)

Print name

Date (MM-DD-YYYY)

 I certify that I have the capacity to sign for the person identified on line 1 of this form.

Certificate of Foreign Government or Other Foreign Organization for United States Tax Withholding and Reporting

(For use by foreign governments, international organizations, foreign central banks of issue, foreign tax-exempt organizations, foreign private foundations, and governments of U.S. possessions.)

OMB No. 1545-1621

- Go to www.irs.gov/FormW8EXP for instructions and the latest information.
- Section references are to the Internal Revenue Code.
- Give this form to the withholding agent or payer. Do not send to the IRS.

Do not use this form for:

- A foreign government or other foreign organization that is not claiming the applicability of section(s) 115(2), 501(c), 892, 895, or 1443(b).
- A beneficial owner solely claiming foreign status or treaty benefits.
- A foreign partnership or a foreign trust.
- A person claiming that income is effectively connected with the conduct of a trade or business in the United States.
- A person acting as an intermediary.

Instead, use Form:

- W-8BEN-E or W-8ECI
- W-8BEN or W-8BEN-E
- W-8BEN-E or W-8IMY
- W-8ECI
- W-8IMY

Part I Identification of Beneficial Owner

1 Name of organization	2 Country of incorporation or organization
3 Type of entity <div style="display: flex; justify-content: space-around;"> <input type="checkbox"/> Foreign government <input type="checkbox"/> Foreign tax-exempt organization <input type="checkbox"/> International organization <input type="checkbox"/> Foreign private foundation <input type="checkbox"/> Foreign central bank of issue (not wholly owned by the foreign sovereign) <input type="checkbox"/> Government of a U.S. possession </div>	

4 Chapter 4 Status (FATCA status):

<input type="checkbox"/> Participating FFI. <input type="checkbox"/> Reporting Model 1 FFI. <input type="checkbox"/> Reporting Model 2 FFI. <input type="checkbox"/> Registered deemed-compliant FFI (other than a Reporting Model 1 FFI). <input type="checkbox"/> Nonreporting IGA FFI. Complete Part III. <input type="checkbox"/> Territory financial institution. Complete Part III. <input type="checkbox"/> International organization.	<input type="checkbox"/> Foreign government (including a political subdivision), government of a U.S. possession, or foreign central bank of issue. Complete Part III. <input type="checkbox"/> Exempt retirement plan of foreign government. Complete Part III. <input type="checkbox"/> 501(c) organization. Complete Part III. <input type="checkbox"/> Passive NFFE. Complete Part III. <input type="checkbox"/> Direct reporting NFFE. <input type="checkbox"/> Sponsored direct reporting NFFE. Complete Part III.
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5 Permanent address (street, apt. or suite no., or rural route). Do not use a P.O. box or in-care-of address (other than a registered address).

City or town, state or province. Include postal code where appropriate.	Country
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6 Mailing address (if different from above).

City or town, state or province. Include postal or ZIP code where appropriate.	Country
--	---------

7 U.S. TIN, if required (see instructions)	8a GIIN	8b Foreign TIN (see instructions)
--	---------	-----------------------------------

9 Reference number(s) (see instructions)

Part II Qualification Statement for Chapter 3 Status

10 For a foreign government:

- a I certify that the entity identified in Part I is a foreign government within the meaning of section 892 and the payments are within the scope of the exemption granted by section 892.

Check box 10b or box 10c, whichever applies.

- b The entity identified in Part I is an integral part of the government of _____.
- c The entity identified in Part I is a controlled entity of the government of _____.

11 For an international organization:

I certify that:

- The entity identified in Part I is an international organization within the meaning of section 7701(a)(18), **and**
- The payments are within the scope of the exemption granted by section 892.

12 For a foreign central bank of issue (not wholly owned by the foreign sovereign):

I certify that:

- The entity identified in Part I is a foreign central bank of issue,
- The entity identified in Part I does not hold obligations or bank deposits to which this form relates for use in connection with the conduct of a commercial banking function or other commercial activity, **and**
- The payments are within the scope of the exemption granted by section 895.

Part II Qualification Statement for Chapter 3 Status (continued)**13 For a foreign tax-exempt organization, including foreign private foundations:**

If any of the income to which this certification relates constitutes income includable under section 512 in computing the entity's unrelated business taxable income, attach a statement identifying the amounts.

Check either box 13a or box 13b.

- a** I certify that the entity identified in Part I has been issued a determination letter by the IRS dated _____ that is currently in effect and that concludes that it is an exempt organization described in section 501(c).
- b** I have attached to this form an opinion from U.S. counsel concluding that the entity identified in Part I is described in section 501(c).

For section 501(c)(3) organizations only, check either box 13c or box 13d.

- c** If the determination letter or opinion of counsel concludes that the entity identified in Part I is described in section 501(c)(3), I certify that the organization is not a private foundation described in section 509. I have attached an affidavit of the organization setting forth sufficient facts for the IRS to determine that the organization is not a private foundation because it meets one of the exceptions described in section 509(a)(1), (2), (3), or (4).
- d** If the determination letter or opinion of counsel concludes that the entity identified in Part I is described in section 501(c)(3), I certify that the organization is a private foundation described in section 509.

14 For a government of a U.S. possession:

- I certify that the entity identified in Part I is a government of a possession of the United States, or is a political subdivision thereof, and is claiming the exemption granted by section 115(2).

Part III Qualification Statement for Chapter 4 Status (if required)**15 For a nonreporting IGA FFI:**

- I certify that the entity identified in Part I:
 - Meets the requirements to be considered a nonreporting financial institution pursuant to an applicable IGA between the United States and _____;
 - Is treated as a _____ under the provisions of the applicable IGA (see instructions); **and**
 - If you are an FFI treated as a registered deemed-compliant FFI under an applicable Model 2 IGA, provide your GIIN: _____.

16 For a territory financial institution:

- I certify that the entity identified in Part I is a financial institution (other than an investment entity) that is incorporated or organized under the laws of a possession of the United States.

17 For a foreign government (including a political subdivision), government of a U.S. possession, or foreign central bank of issue:

- I certify that the entity identified in Part I is the beneficial owner of the payment and is not engaged in commercial financial activities of a type engaged in by an insurance company, custodial institution, or depository institution with respect to the payments, accounts, or obligations for which this form is submitted (except as permitted in Regulations section 1.1471-6(h)(2)).

18 For an exempt retirement plan of a foreign government:

- I certify that the entity identified in Part I:
 - Is established and sponsored by a foreign government, international organization, central bank of issue, or government of a U.S. possession (each as defined in Regulations section 1.1471-6 or an applicable Model 1 or Model 2 IGA) to provide retirement, disability, or death benefits to beneficiaries or participants that are current or former employees of the sponsor (or persons designated by such employees); **or**
 - Is established and sponsored by a foreign government, international organization, central bank of issue, or government of a U.S. possession (each as defined in Regulations section 1.1471-6 or an applicable Model 1 or Model 2 IGA) to provide retirement, disability, or death benefits to beneficiaries or participants that are not current or former employees of such sponsor, but are in consideration of personal services performed for the sponsor.

19 For a 501(c) organization:

- I certify that the entity identified in Part I is an entity described in section 501(c) but is not an insurance company described in section 501(c)(15).

20 For a passive NFFE:

- a** I certify that the entity identified in Part I is a foreign entity that is not a financial institution (other than an investment entity) organized in a possession of the United States.

Check box 20b or 20c, whichever applies.

- b** I further certify that the entity identified in Part I has no substantial U.S. owners, **or**
- c** I further certify that the entity identified in Part I has provided a statement including the name, address, and TIN of each substantial U.S. owner of the NFFE (see instructions).

21 Name of sponsoring entity:

- I certify that the entity identified in Part I is a direct reporting NFFE that is sponsored by the entity identified in line 21.

Part IV Certification

Under penalties of perjury, I declare that I have examined the information on this form and to the best of my knowledge and belief it is true, correct, and complete. I further certify under penalties of perjury that:

- The organization for which I am signing is the beneficial owner of the income and other payments to which this form relates,
- The beneficial owner is not a U.S. person,
- For a beneficial owner that is a controlled entity of a foreign sovereign (other than a central bank of issue wholly owned by a foreign sovereign), the beneficial owner is not engaged in commercial activities within or outside the United States, **and**
- For a beneficial owner that is a central bank of issue wholly owned by a foreign sovereign, the beneficial owner is not engaged in commercial activities within the United States.

Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the payments of which I am the beneficial owner or any withholding agent that can disburse or make payments of the amounts of which I am the beneficial owner.

I agree that I will submit a new form within 30 days if any certification made on this form becomes incorrect.

**Sign
Here** ➔

Signature of authorized official

Print name

Date (MM-DD-YYYY)

I certify that I have the capacity to sign for the entity identified on line 1 of this form.

Notice of Expatriation and Waiver of Treaty Benefits

► Section references are to the Internal Revenue Code.
► Give this form to the payer. Do not send to the IRS.

OMB No. 1545-2138

Please print or type	Name of owner	U.S. taxpayer identification number
	Permanent address	Expatriation date
	City, province or state, postal code, and country	
	Current mailing address, if different from permanent address. Include apt. or suite no., or P.O. box if mail is not delivered to street address.	
	City, town or post office, state, and ZIP code. If you have a foreign address, enter city, province or state, postal code, and country.	

Under penalties of perjury, I certify that I am a covered expatriate (as defined in the instructions below). Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the income of which I am the beneficial owner or any withholding agent that can disburse or make payments of the income of which I am the beneficial owner.

Name of payer _____

Account Number
(or other identifying information) _____

For the payer above, check the box below if you had any of the following items on the day before your expatriation date (see instructions).

- 1. Eligible Deferred Compensation Item. Checking this box notifies the payer that you are irrevocably waiving any right to claim any reduction in withholding for such eligible deferred compensation item under any treaty with the United States (see instructions)
- 2. Ineligible Deferred Compensation Item
- 3. Specified Tax Deferred Account
- 4. Nongrantor Trust. Checking this box notifies the payer that you will be treated as having waived any right to claim any reduction in withholding on any distribution from this trust under any treaty with the United States (see instructions)
- Checking this box notifies the payer that you are electing to be treated as having received the value of your interest in the trust on the day before your expatriation date and that you will be subject to withholding under section 877A until the payer receives (a) a copy of the letter ruling issued by the IRS stating the value of your interest in the trust and (b) your certification that you have paid any tax due on the receipt of the value of your interest in the trust (see instructions).

► Signature _____ Date _____

General Instructions

Purpose

Use Form W-8CE to notify the payer that you are a covered expatriate individual subject to special tax rules.

Covered Expatriate

You are a covered expatriate if you are an expatriate to whom any of the following applied on your expatriation date.

1) Your average annual net income tax for the 5-year period ending the year before your expatriation date is more than \$145,000 (for 2009 and 2010). This amount is indexed for inflation. For years after 2010, see the Instructions for Form 8854 for the adjusted amount.

2) Your net worth is \$2 million or more.
3) You have not certified under penalties of perjury that you met all federal tax

obligations for the preceding 5 years or have not submitted evidence of such compliance.

Exceptions. Statements (1) and (2) above do not apply if:

- You became a U.S. citizen and a citizen of another country at birth and, as of your expatriation date, continue to be a citizen of, and taxed as a resident of, such other country, and you were a U.S. resident for not more than 10 tax years during the 15-year period ending with the tax year in which you expatriated, or
- You relinquished U.S. citizenship before the age of 18½ and were a U.S. resident for not more than 10 tax years before your expatriation date.

Expatriate. An expatriate is a U.S. citizen who relinquished citizenship or a long-term resident who ceased to be a lawful permanent resident.

Long-Term Resident. For expatriation purposes, a long-term resident is any individual who was a lawful permanent resident of the United States in at least 8 out of the last 15 tax years ending with the tax year of expatriation.

Expatriation date. Your expatriation date is the date you relinquished U.S. citizenship or the date on which you ceased to be a lawful permanent U.S. resident.

Who Must File

Covered expatriates are required to give Form W-8CE to the payer if they had any of the items identified in Boxes 1 through 4 on the day before their expatriation date. In addition, all expatriates must file Form 8854 with the Internal Revenue Service.

Deferred compensation items. Deferred compensation items include any interest in a plan or arrangement described in section 219(g)(5), any interest in a foreign pension plan or similar retirement arrangement

or program, any item of deferred compensation, and any property, or right to property, that the individual is entitled to receive in connection with the performance of services to the extent not previously taken into account under section 83 or in accordance with section 83.

Eligible deferred compensation item

(Box 1). A deferred compensation item is an eligible deferred compensation item if the following three conditions are met.

1. The payer is either a U.S. person or a foreign person electing to be treated as a U.S. person under an agreement with the IRS. (Separate guidance will be issued providing procedures to make this election.)

2. You notify the payer of your status as a covered expatriate.

3. You make an irrevocable waiver on Form 8854 of any right to claim any reduction of withholding on this item under any treaty with the United States.

Check Box 1 if you have an eligible deferred compensation item. Checking this box provides notice to the payer that you are a covered expatriate who is waiving benefits under any treaty with the United States for the eligible deferred compensation item.

Ineligible deferred compensation item

(Box 2). A deferred compensation item is an ineligible deferred compensation item if the three conditions listed above are not met.

Check Box 2 if you have an ineligible deferred compensation item. Checking this box provides notice to the payer that you are a covered expatriate who is to be treated as receiving an amount equal to the present value of your accrued benefit on the day before your expatriation date.

Specified tax deferred account (Box 3).

Specified tax deferred accounts include individual retirement plans (as defined in section 7701(a)(37)) other than arrangements described in subsection (k) or (p) of section 408, qualified tuition programs (as defined in section 529), Coverdell education savings accounts (as defined in section 530), health savings accounts (as defined in section 223), and Archer MSAs (as defined in section 220).

Check Box 3 if you have a specified tax deferred account. Checking this box provides notice to the payer that you are a covered expatriate who is to be treated as receiving a distribution of your entire interest in the account on the day before your expatriation date.

Nongrantor trust (Box 4). A nongrantor trust is the portion of any trust (U.S. or foreign) that you are not considered (immediately before your expatriation date) to own under the grantor trust rules (see sections 671 through 679). The withholding rules of section 877A apply to a nongrantor trust only if you were a beneficiary on the day before your expatriation date.

Check Box 4 if you were the beneficiary of a nongrantor trust on the day before your expatriation date. Checking this box provides notice to the trustee that you are a covered expatriate who, unless the box below this line is checked, is deemed to have waived any right to claim any reduction in withholding on any distribution from this trust under any treaty with the United States.

Election to be treated as receiving value of interest in the trust. You can elect to pay tax currently on the value of your interest in the trust if you first obtain a letter ruling from the IRS stating the value of your interest in the trust as of the day before your expatriation date. Make the election on Form 8854. Attach the valuation letter ruling to Form 8854 and file Form 8854 with your Form 1040 or Form 1040NR. An election is not valid unless your income tax return is filed by the due date plus extensions.

When To File

File Form W-8CE on the earlier of (a) the day before the first distribution on or after the expatriation date or (b) thirty (30) days after the expatriation date for each specified tax deferred account, item of deferred compensation, or interest in a nongrantor trust.

Where To File

Give Form W-8CE to each payer of the income described above. Keep a copy for your own records.

Instructions for Payer

As a result of receiving notification of expatriation on Form W-8CE, you may have a requirement to withhold tax under section 877A or to report information to the IRS.

Eligible deferred compensation. You must withhold 30% on any taxable payment to the covered expatriate.

Ineligible deferred compensation. You must advise the covered expatriate within 60 days of receipt of this form of the present value of the individual's accrued benefit in the deferred compensation item on the day before the expatriation date.

Specified tax deferred account. You must advise the covered expatriate within 60 days of receipt of this form of the individual's entire interest in the account on the day before the expatriation date.

Nongrantor trust. If the covered expatriate elects to be treated as receiving the value of his interest in the nongrantor trust on the day before his expatriation date, you must provide the covered expatriate within

60 days of receipt of this form with the information needed to calculate the value of his interest in the trust as of the day before the expatriation date. This information includes the following.

- A copy of the trust deed document.
- A list of assets held by the trust on the day before the expatriation date and the values of such assets.
- Relevant information about the interests of the other beneficiaries.
- Dates of birth of all persons who constitute measuring lives for any distributions.
- Policies used by trustees in making discretionary distributions (if any) that may constitute an ascertainable standard.
- Any other relevant information.

If you do not provide such documents and information to the covered expatriate, then the election is not valid and you must withhold 30% on any taxable distributions from the trust.

If the covered expatriate makes the election, you must withhold 30% on any taxable distribution from the trust until you receive (a) a copy of the valuation letter ruling issued by the IRS and (b) the covered expatriate's certification under penalties of perjury that he has paid any tax due on the value of the trust that he is treated as receiving.

Paperwork Reduction Act Notice. We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to provide the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated average time is: **Recordkeeping**, 3 hr., 35 min.; **Learning about the law or the form**, 1 hr., 00 min.; **Preparing and sending the form**, 1 hr., 6 min.

If you have comments concerning the accuracy of these time estimates or suggestions for making this form simpler, we would be happy to hear from you. You can email us at taxforms@irs.gov. (The asterisk must be included in the address.) Enter "Forms Comment" on the subject line. Or you can write to Internal Revenue Service, Tax Products Coordinating Committee, SE:W:CAR:MP:T:T:SP, 1111 Constitution Ave. NW, IR-6526, Washington, DC 20224. Do not send Form W-8CE to this address. Instead, give it to the payer.