

Roger Rabbit Inc.

00-000004

FORM 1120 TEST SCENARIO 4

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

FORMS REQUIRED: 1120, Sch G (F1120), Sch M-3 (F1120), Sch N (F1120), 926, 1118, Sch J (F1118), 5471, Sch E (5471), Sch H (F5471), Sch J (F5471), Sch M (F5471), Sch O (F5471), 5472, 8832, 8858 (2), F8975, Schedule A (F8975) (3)

ATTACHMENTS:

- ItemizedOtherDeductionsSchedule
- ItemizedOtherCurrentAssetsSchedule
- ItemizedOtherInvestmentSchedule
- ItemizedOtherInvestmentsSchedule
- NonincludibleForeignEntitySchedule
- OtherIncomeLossItemsWithDifferencesSchedule
- OtherExpenseDeductionItemsWithDifferencesSchedule
- Category3FilerStatement
- ItemizedOtherDeductionsSchedule2
- ItemizedOtherCurrentAssetsSchedule
- ItemizedOtherCurrentLiabilitesSchedule
- ItemizedOtherLiabilitiesSchedule
- EarningsAndProfitsOtherAdjStmt

BINARY ATTACHMENTS: Organizational Chart for Form 5471 Sch O

HEADER INFO: Not on actual form

MultipleSoftwarePackagesUsed: No

Originator: **EFIN:** Self-select
Type: ERO
Practioner PIN:
 EFIN: Self-select
PIN: Self-select
PIN Entered by: ERO

Signature Option: PIN Number

Officer: **Name:** Poppy Seed
Title: Chief Executive Officer
Officer PIN: 000-00-1234
Taxpayer PIN: Self-select
Phone: 888-555-1212
Email Address: poppyseed@john.com

Date signed: 02/15/2025

Preparer Name:
Date Prepared: Johnny Appleseed
IRS PAYMENT: 02/12/2025
Prior Year Income Amt: N/A
 \$0

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Description	Foreign Amount	Amount
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Sept 19, 2024**Tax Year 2024
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Miscellaneous Deductions	199,936,000	295,720,000
Operating Supplies	356,382,000	527,114,000
TOTAL*	556,318,000	822,834,000

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

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

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

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

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

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

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

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

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

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

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

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

U.S. Corporation Income Tax Return

OMB No. 1545-0123

2024

Sept 19, 2024

Form 1120

Department of the Treasury Internal Revenue Service

For calendar year 2024 or tax year beginning , 2024, ending , 20

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

A Check if:

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

TYPE OR PRINT

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

B Employer identification number

00-0000004

C Date incorporated

08-01-1985

D Total assets (see instructions)

\$ 250,306,361,000

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

Table with 11 rows for Income (1a-11) and columns for description, amount, and total. Total income is 43,668,620,000.

Table with 19 rows for Deductions (12-29c) and columns for description, amount, and total. Total deductions are 120,387,000.

Table with 7 rows for Tax, Refundable Credits, and Payments (30-37) and columns for description, amount, and total. Amount owed is 100,000,000.

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

Sign Here

Signature of officer, Date, Title

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

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

Tax Year 2024
1120 MeF ATS Scenario 4

Sept 19, 2024

Form 1120 (2024)

Page **2**

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

Form **1120** (2024)

Tax Year 2024
1120 MeF ATS Scenario 4

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Form 1120 (2024)

Schedule J Tax Computation and Payment (see instructions)

Table with columns for line numbers, descriptions, sub-rows (1a-1z, 2-4, 5a-5f, 6-8, 9a-9z, 10-11c, 12-19, 20a-20z, 21-23), and values. Includes entries like 'Income tax', 'Total income tax', 'Total payments and credits'.

Schedule K Other Information (see instructions)

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

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

DRAFT AS OF May 23, 2024

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

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

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

Tax Year 2024
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Schedule K Other Information (continued from page 4)

Table with 3 columns: Question number, Question text, and Yes/No columns. Contains questions 13 through 31 regarding corporate receipts, assets, and tax requirements.

Tax Year 2024
1120 MeF ATS Scenario 4

Sept 19, 2024

Form 1120 (2024)

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

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

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

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

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

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

**SCHEDULE M-3
(Form 1120)**

(Rev. December 2019)
Department of the Treasury
Internal Revenue Service

**Net Income (Loss) Reconciliation for Corporations
With Total Assets of \$10 Million or More**

Attach to Form 1120 or 1120-C.

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

OMB No. 1545-0123

Name of corporation (common parent, if consolidated return)

Roger Rabbit Inc.

Employer identification number

00-0000004

Check applicable box(es): (1) Non-consolidated return (2) Consolidated return (Form 1120 only)

(3) Mixed 1120/L/PC group (4) Dormant subsidiaries schedule attached

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

1a Did the corporation file SEC Form 10-K for its income statement period ending with or within this tax year?

Yes. Skip lines 1b and 1c and complete lines 2a through 11 with respect to that SEC Form 10-K.

No. Go to line 1b. See instructions if multiple non-tax-basis income statements are prepared.

b Did the corporation prepare a certified audited non-tax-basis income statement for that period?

Yes. Skip line 1c and complete lines 2a through 11 with respect to that income statement.

No. Go to line 1c.

c Did the corporation prepare a non-tax-basis income statement for that period?

Yes. Complete lines 2a through 11 with respect to that income statement.

No. Skip lines 2a through 3c and enter the corporation's net income (loss) per its books and records on line 4a.

2a Enter the income statement period: Beginning MM/DD/YYYY Ending MM/DD/YYYY

b Has the corporation's income statement been restated for the income statement period on line 2a?

Yes. (If "Yes," attach an explanation and the amount of each item restated.)

No.

c Has the corporation's income statement been restated for any of the five income statement periods immediately preceding the period on line 2a?

Yes. (If "Yes," attach an explanation and the amount of each item restated.)

No.

3a Is any of the corporation's voting common stock publicly traded?

Yes.

No. If "No," go to line 4a.

b Enter the symbol of the corporation's primary U.S. publicly traded voting common stock

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c Enter the nine-digit CUSIP number of the corporation's primary publicly traded voting common stock

--	--	--	--	--	--	--	--	--	--	--

4a Worldwide consolidated net income (loss) from income statement source identified in Part I, line 1 **4a** 41,329,115,000

b Indicate accounting standard used for line 4a (see instructions):

(1) GAAP (2) IFRS (3) Statutory (4) Tax-basis (5) Other (specify) _____

5a Net income from nonincludible foreign entities (attach statement) **5a** (41,193,236,000)

b Net loss from nonincludible foreign entities (attach statement and enter as a positive amount) **5b** _____

6a Net income from nonincludible U.S. entities (attach statement) **6a** (_____)

b Net loss from nonincludible U.S. entities (attach statement and enter as a positive amount) **6b** _____

7a Net income (loss) of other includible foreign disregarded entities (attach statement) **7a** _____

b Net income (loss) of other includible U.S. disregarded entities (attach statement) **7b** _____

c Net income (loss) of other includible entities (attach statement) **7c** _____

8 Adjustment to eliminations of transactions between includible entities and nonincludible entities (attach statement) **8** _____

9 Adjustment to reconcile income statement period to tax year (attach statement) **9** _____

10a Intercompany dividend adjustments to reconcile to line 11 (attach statement) **10a** _____

b Other statutory accounting adjustments to reconcile to line 11 (attach statement) **10b** _____

c Other adjustments to reconcile to amount on line 11 (attach statement) **10c** _____

11 **Net income (loss) per income statement of includible corporations.** Combine lines 4 through 10 **11** 135,879,000

Note: Part I, line 11, must equal Part II, line 30, column (a), or Schedule M-1, line 1 (see instructions).

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

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

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

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

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

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

Name of corporation (common parent, if consolidated return) Roger Rabbit Inc.	Employer identification number 00-000004
Check applicable box(es): (1) <input type="checkbox"/> Consolidated group (2) <input type="checkbox"/> Parent corp (3) <input type="checkbox"/> Consolidated eliminations (4) <input type="checkbox"/> Subsidiary corp (5) <input type="checkbox"/> Mixed 1120/L/PC group	
Check if a sub-consolidated: (6) <input type="checkbox"/> 1120 group (7) <input type="checkbox"/> 1120 eliminations	
Name of subsidiary (if consolidated return)	Employer identification number

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

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

Department of the Treasury
 Internal Revenue Service

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

2024

Name
 Roger Rabbit Inc.

Employer identification number (EIN)
 00-0000004

Foreign Operations Information

	Yes	No
1a During the tax year, did the corporation own (directly or indirectly) any foreign entity that was segregated as an entity separate from its owner under Regulations sections 301.7701-2 and 301.7701-3 or did the corporation own (directly or indirectly) any foreign branch (see instructions)? If "Yes," you are generally required to attach Form 8858 , Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (including Foreign Branches, FBSs, or controlled FEs and for each FBS or controlled FE).	✓	
b Enter the number of Form 8858 s attached to the corporation's tax return		
2 Enter the number of Forms 8865 , Return of U.S. Persons With Respect to Certain Foreign Partnerships, attached to the corporation's tax return		
3 Excluding any partnership for which a Form 8865 is attached to the tax return, did the corporation own at least a 10% interest, directly or indirectly, in any other foreign partnership (including entities treated as a foreign partnership under Regulations section 301.7701-2 or 301.7701-3)? If "Yes," see instructions for required statement.		✓
4a Reserved for future use		
b Enter the number of Forms 5471 , Information Return of U.S. Persons With Respect to Certain Foreign Corporations, attached to the corporation's tax return 1		
5 During the tax year, did the corporation receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If "Yes," the corporation may have to file Form 3520 , Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts.		✓
6a At any time during the 2024 calendar year, did the corporation have an interest in or a signature or other authority over a financial account (such as a bank account, securities account, or other financial account) in a foreign country?	✓	
b See the instructions for exceptions and filing requirements for FinCEN Form 114 , Report of Foreign Bank and Financial Accounts (FBAR). If "Yes," enter the name of the foreign country <u>UK</u>		
7a Is the corporation claiming the extraterritorial income exclusion? If "Yes," attach a separate Form 8873 , Extraterritorial Income Exclusion, for each transaction or group of transactions.		✓
b Enter the number of Forms 8873 attached to the tax return		
c Enter the total of the amounts from line 52 (extraterritorial income exclusion (net of disallowed deductions)) of all Forms 8873 attached to the tax return \$		
8 Was the corporation a specified domestic entity required to file Form 8938 for the tax year (see the Instructions for Form 8938)?		✓

Tax Year 2024 1120 MeF ATS Scenario 4 Return by a U.S. Transferor of Property to a Foreign Corporation

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

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

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

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

Table with 2 columns: Controlling shareholder, Identifying number

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

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

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

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

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

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

Part II Transferee Foreign Corporation Information (see instructions)

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

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

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

8 Foreign law characterization (see instructions) Corporation

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

Part III Information Regarding Transfer of Property (see instructions)

Section A—Cash

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	09/30/2024		100 333 000		

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

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

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	08/25/2024	IDD Stock	25 752 000	35 452 000	0
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

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

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

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

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

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

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

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

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

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

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

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

- 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 100% (b) After 100%
17 Type of nonrecognition transaction (see instructions) 356
18 Indicate whether any transfer reported in Part III is subject to any of the following.
a Gain recognition under section 904(f)(3)
b Gain recognition under section 904(f)(5)(F)
c Recapture under section 1503(d)
d Exchange gain under section 987
19 Did this transfer result from a change in entity classification?
20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.
b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$
c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

For calendar year 20, or other tax year beginning 20, and ending 20

Name of corporation
Roger Rabbit Inc.

Employer identification number
00-0000004

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

a Separate Category (Enter code—see instructions.)

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)

c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)

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

	1. EIN or Reference ID Number (see instructions)*	2. Foreign Country Code (U.S. Possessions, enter two-letter code; use a separate line for each) (see instructions)	3. Ir Adjustments (see instructions)	Gross Income or Loss From Sources Outside the United States		5. Interest
				(a) Exclude Gross-Up	(b) Gross-Up (section 78)	
A	00-0000004	UK	43 668 620 000			
B						
C						
Totals (add lines A through C)			43 668 620 000			
6. Gross Rents, Royalties, and License Fees						
A				9. Currency Gain	10. Currency Gain Code (see instructions)	11. Other (attach schedule)
B						12. Total (add columns 3(a) through 9 and 11)
C						43 668 620 000
Totals						43 668 620 000

13. Allocable Deductions

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

13. Allocable Deductions (continued)

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

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

For Paperwork Reduction Act Notice, see separate instructions.

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

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

1. Credit is Claimed for Taxes (check one): Paid Accrued

	Date		Tax Withheld at Source on:					
	Date Paid	Date Accrued	(a) Dividends	(b) Distributions of Previously Taxed Earnings and Profits	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
A								
B								
C								
Totals (add lines A through C)								

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued)

	Other Foreign Taxes Paid or Accrued on:			(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	3. Tax Deemed Paid (see instructions)
	(g) Sales	(h) Services Income	(i) Other		
A					11 788.082
B					
C					
Totals					

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

	1a	1b	2	3	4	5	6	7	8a	8b	8c	9	10	11	12	13	14
1a Total foreign taxes paid or accrued (total from Part I, column 2(i))																	
b Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)																	
2 Total taxes deemed paid (total from Part I, column 3)			11 788.082														
3 Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I)				11 788.082													
4 Taxes reclassified under high-tax kickout																	
5 Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year																	
6 Total foreign taxes (combine lines 1a through 5)																	
7 Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 17 of the applicable Schedule A																	
8a Total taxable income from all sources (enter taxable income from the corporation's tax return)									0								
b Adjustments to line 8a (see instructions)																	
c Subtract line 8b from line 8a																	
9 Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1																	
10 Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)																	
11 Multiply line 9 by line 10																	
12 Increase in limitation (section 960(c))																	
13 Credit limitation (add lines 11 and 12) (see instructions)																	
14 Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III																	0

Schedule F Reserved

Schedule G Reductions of Taxes Paid, Accrued, or Deemed Paid

Part I—Reduction Amounts

	A	B	C	D	E	F	G	H
Reduction of taxes under section 901(e)—Attach separate schedule								
Reduction of foreign taxes—Enter on Form 901, line 10								
Reduction of taxes on income from Schedule E—Enter on Schedule E, line 10 (see instructions)								
Important: Enter only "specifically attributable taxes" here								
Reduction of taxes for section 6038(c)—Attach separate schedule								
Taxes suspended under section 909								
Reduction for disallowed taxes under section 965(g)								
Reduction for disallowed taxes under section 245A								11 788 082
Other reductions in taxes (attach schedule—see instructions)								11 788 082

Total (add lines A through H). Enter here and on Schedule B, Part II, line 3 11 788 082

Part II—Other Information

I	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(m)	<input type="checkbox"/>
J	Check this box if, during the tax year, the corporation paid or accrued any foreign tax that was disqualified for credit under section 901(j), (k), or (l)	<input type="checkbox"/>

DRAFT AS OF
September 28, 2022
DO NOT FILE

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

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

*** Important:** See **Computer-Generated Schedule J** in instructions.
 For Paperwork Reduction Act Notice, see the Instructions for Form 1118.

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

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

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

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

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

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

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

Sept 19, 2024

Tax Year 2024
1120 MeF ATS Scenario 4

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

Form 5471

(Rev. December 2024)

OMB No. 1545-0123

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

Department of the Treasury Internal Revenue Service

Information furnished for the foreign corporation's annual accounting period (tax year required by section 898) (see instructions) beginning Jan 01, 20 24, and ending Dec 31, 20 24

Attachment Sequence No. 121

Name of person filing this return

Roger Rabbit Inc

A Identifying number

00-0000004

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

35 An Street

B Category of filer (see instructions) (check applicable box(es)):

City or town, state, and ZIP code

An ton NY 10006

1b [] 2 [] 3 [] 4 [] 5b []

C Enter the total percentage of the foreign corporation's outstanding stock you owned at the end of its annual accounting period 100 %

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

D Check box if this is a final Form 5471 for the foreign corporation []

E Check if any excepted specified foreign financial assets are reported on this form (see instructions) []

F Check the box if this Form 5471 has been completed using "Alternative Information" under Rev. Proc. 2019-40 []

G If the box on line F is checked, enter the corresponding code for "Alternative Information" (see instructions)

H Person(s) on whose behalf this information return is filed:

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

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

1a Name and address of foreign corporation: Foreign Finance Corporation, 75 An Street, Birmingham England 126375. b(1) Employee identification number: 00-0000045. b(2) Reference ID number: ABC1234. b(3) Previous reference ID number(s): []. c Country under whose laws incorporated: UK

d Date of incorporation: 01/01/1990. e Principal place of business: UK. f Principal business activity code number: 523900. g Principal business activity: Financial Investment. h Functional currency code: GBP

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

Schedule A Stock of the Foreign Corporation

Table with 3 columns: (a) Description of each class of stock, (b) Number of shares issued and outstanding (i) Beginning of annual accounting period, (ii) End of annual accounting period. Rows: Common (750, 1 000), Preferred (193 710, 258 280).

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 49958V

Form 5471 (Rev. 12-2024)

Schedule C Income Statement (see instructions)

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

		Functional Currency	U.S. Dollars
Income	1a		
	b		
	c		
	2		
	3		
	4		
	5	35 294 101 000	35 294 101 000
	6a	1 988 962 000	22 169 741 000
	b		
	7		
8a			
b			
9			
10	42 851 300 000	57 463 842 000	
Deductions	11		
	12a	2 588 175 000	3 828 095 000
	b		
	13	56 977 000	54 692 000
	14		
	15		
	16	121 000	179 000
	17	556 318 000	822 834 000
18	3 181 591 000	4 705 800 000	
Net Income	19	40 669 712 000	52 758 042 000
	20	12 800 000 000	11 564 806 000
	21a		
	b		
	22	27 850 747 000	41 193 236 000
Other Comprehensive Income	23a		
	b		
	c		
	24		

Schedule F Balance Sheet

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

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash	8 557 500 000	3 281 502 000
2a	Trade receivables	855 252 000	15 006 554 000
b	Less allowance for bad debts	()	()
3	Derivatives		
4	Inventories		
5	Other current assets (attach statement)	255 108 000	243 012 000
6	Loans to shareholders and other related persons	26 569 964 000	
7	Investments in subsidiaries (attach statement)		
8	Other investments (attach statement)	57 437 0	36 820 277 000
9a	Buildings		
b	Less accumulated depreciation	()	()
10a	Depletable assets		
b	Less accumulated depletion	()	()
11	Land (net of accumulated amortization)		
12	Intangible assets:		
a	Goodwill		
b	Organization costs		
c	Patents, trademarks, and other intangible assets	11 727 492 000	21 085 517 000
d	Less accumulated amortization for lines 12a, 12b, and 12c	()	()
13	Other assets (attach statement)		
14	Total assets	48 023 359 000	76 436 862 000
Liabilities and Shareholders' Equity			
15	Accounts payable		68 312 000
16	Other current liabilities (attach statement)	4 001 670 000	5 080 202 000
17	Derivatives		
18	Loans from shareholders and other related persons		
19	Other liabilities (attach statement)	2 016 000 000	1 247 422 000
20	Capital stock:		
a	Preferred stock	57 545 333 000	76 727 110 000
b	Common stock	750 000 000	1 000 000 000
21	Paid-in or capital surplus (attach reconciliation)		
22	Retained earnings		
23	Less cost of treasury stock	(16 290 072 000)	(7 686 184 000)
24	Total liabilities and shareholders' equity	48 023 359 000	76 436 862 000

Schedule G Other Information

	Yes	No
1 During the tax year, did the foreign corporation own at least a 10% interest, directly or indirectly, in any foreign partnership? If "Yes," see the instructions for required statement.		✓
2 During the tax year, did the foreign corporation own an interest in any trust?		✓
3 During the tax year, did the foreign corporation own any foreign entities that were disregarded as separate from their owner under Regulations sections 301.7701-2 and 301.7701-3 or did the foreign corporation own any foreign branches (see instructions)? If "Yes," you are generally required to attach Form 8858 for each entity or branch (see instructions).		✓
4a During the tax year, did the filer pay or accrue any base erosion payment under section 59A(d) to the foreign corporation or did the filer have a base erosion tax benefit under section 59A(c)(2) with respect to a base erosion payment made or accrued to the foreign corporation (see instructions)? If "Yes," complete lines 4b and 4c.		✓
b Enter the total amount of the base erosion payments		\$ _____
c Enter the total amount of the base erosion tax benefits		\$ _____
5a During the tax year, did the foreign corporation pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? If "Yes," complete line 5b.		✓
b Enter the total amount of the disallowed deductions (see instructions)		\$ _____

Schedule G Other Information (continued)

	Yes	No
6a Is the filer claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transactions with the foreign corporation? If "Yes," complete lines 6b, 6c, and 6d. See instructions.		✓
b Enter the amount of gross receipts derived from all sales of general property to the foreign corporation that the filer included in its computation of foreign-derived intangible income (FDDEI) \$ _____		
c Enter the amount of gross receipts derived from all sales of intangible property to the foreign corporation that the filer included in its computation of FDDEI \$ _____		
d Enter the amount of gross receipts derived from all services provided to the foreign corporation that the filer included in its computation of FDDEI \$ _____		
7 During the tax year, was the foreign corporation a participant in any cost sharing arrangement? If the answer to question 7 is "Yes," complete separate Schedule G for each cost sharing arrangement in which the foreign corporation was a participant during the tax year.		✓
8 From April 1, 2014, to December 31, 2017, did the foreign corporation purchase stock or securities of a shareholder of the foreign corporation for use in a triangular reorganization (within the meaning of Regulations section 1.358-6(b)(2))?		✓
9a Did the foreign corporation receive any intangible property in a prior year or the current tax year for which the U.S. transferor is required to report a section 367(a) annual income inclusion for the tax year? If "Yes," go to line 9b.		✓
b Enter in functional currency the amount of the earnings and profits production paid to section 367(d)(2)(B) for the tax year \$ _____		
10 During the tax year, was the foreign corporation an expatriated foreign subsidiary under Regulations section 1.7874-12(a)(9)? If "Yes," see instructions and attach statement.		✓
11 During the tax year did the foreign corporation participate in any reportable transaction as defined in Regulations section 1.6011-4? If "Yes," attach Form(s) 8886 if required by Regulations section 1.6011-4(c)(3)(i)(G).		✓
12 During the tax year, did the foreign corporation pay or accrue any foreign tax that was disqualified for credit under section 901(m)?		✓
13 During the tax year, did the foreign corporation pay or accrue foreign taxes to which section 909 applies, or treat foreign taxes that were previously suspended under section 909 as no longer suspended?		✓
14 Did you answer "Yes" to any of the questions in the instructions for line 14? If "Yes," enter the corresponding code(s) from the instructions and attach statement _____		✓
15 Does the foreign corporation have interest expense disallowed under section 163(j) (see instructions)? If "Yes," enter the amount \$ _____		✓
16 Does the foreign corporation have previously disallowed interest expense under section 163(j) carried forward to the current tax year (see instructions)? If "Yes," enter the amount \$ _____		✓
17a Did any extraordinary reduction with respect to a controlling section 245A shareholder occur during the tax year (see instructions)?		✓
b If the answer to question 17a is "Yes," was an election made to close the tax year such that no amount is treated as an extraordinary reduction amount or tiered extraordinary reduction amount (see instructions)?		✓
18a Did the filer have any loan to or from the foreign corporation to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the filer used a rate of interest within the relevant safe-haven range (100% to 130% of the applicable Federal rate (AFR) for the relevant term)?		✓
b Did the filer have any loan to or from the foreign corporation to which the safe-haven rate rules of Regulations section 1.482-2(a)(2)(iii)(B) are applicable, and for which the filer used a rate of interest outside the relevant safe-haven range (100% to 130% of the AFR for the relevant term)?		✓
19a Did the filer issue a covered debt instrument in any of the transactions described in Regulations section 1.385-3(b)(2) with respect to the foreign corporation during the tax year, or, did the filer issue or refinance indebtedness owed to the foreign corporation during the 36 months before or after the date of a distribution or acquisition described in Regulations section 1.385-3(b)(3)(i) made by the filer, and either the issuance or refinance of indebtedness, or the distribution or acquisition, occurred during the tax year?		✓
b If the answer to question 19a is "Yes," provide the following. (1) The amount of such transaction(s), distribution(s), and acquisition(s) \$ _____ (2) The amount of such related party indebtedness \$ _____		

Schedule G Other Information (continued)

Yes	No
	✓

20a During the tax year, did the foreign corporation pay or accrue any Top-up Tax? See instructions

b If the answer to question 20a is "Yes," enter the amount of each tax paid or accrued. See instructions.

- (1) Income Inclusion Rule (IIR) (or similar taxes) \$ _____
- (2) Qualified Domestic Minimum Top-up Tax (QDMTT) (or similar taxes) \$ _____
- (3) UTPR (or similar taxes) \$ _____

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 July 9, 2024
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Schedule I Summary of Shareholder's Income From Foreign Corporation (see instructions)

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

Name of U.S. shareholder	Identifying number		
1a Section 964(e)(4) subpart F dividend income from the sale of stock of a lower-tier foreign corporation (see instructions)	1a	43 668 620 000	
b Section 245A(e)(2) subpart F income from hybrid dividends of tiered corporations (see instructions)	1b		
c Subpart F income from tiered extraordinary disposition amounts not eligible for subpart F exception under section 954(c)(6)	1c		
d Subpart F income from tiered extraordinary reduction amounts not eligible for subpart F exception under section 954(c)(6)	1d		
e Section 954(c) Subpart F Foreign Personal Holding Company Income (enter result from Worksheet A)	1e		
f Section 954(d) Subpart F Foreign Base Company Sales Income (enter result from Worksheet A)	1f		
g Section 954(e) Subpart F Foreign Base Company Services Income (enter result from Worksheet A)	1g		
h Other subpart F income (enter result from Worksheet A)	1h		
2 Earnings invested in U.S. property (enter the result from Worksheet B)	2		
3 Reserved for future use	3		
4 Factoring income	4		
See instructions for reporting amounts on lines 1, 2, and 4 on your income tax return.			
5a Section 245A eligible dividends (see instructions)	5a		
b Extraordinary disposition amounts (see instructions)	5b		
c Extraordinary reduction amounts (see instructions)	5c		
d Section 245A(e) dividends (see instructions)	5d		
e Dividends not reported on line 5a, 5b, 5c, or 5d	5e		
6 Exchange gain or (loss) on a distribution of previously taxed earnings and profits	6		
7a Was any income of the foreign corporation blocked?		Yes	No
b Did any such income become unblocked during the tax year (see section 964(b))? If the answer to either question is "Yes," attach an explanation.			
8a Did this U.S. shareholder have an extraordinary disposition (ED) account with respect to the foreign corporation at any time during the tax year (see instructions)?			
b If the answer to question 8a is "Yes," enter the U.S. shareholder's ED account balance at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.			
c Enter the CFC's aggregate ED account balance with respect to all U.S. shareholders at the beginning of the CFC year \$ _____ and at the end of the tax year \$ _____. Provide an attachment detailing any changes from the beginning to the ending balances.			
9 Enter the sum of the hybrid deduction accounts with respect to stock of the foreign corporation (see instructions) \$ _____			

Income, War Profits, and Excess Profits Taxes Paid or Accrued

OMB No. 1545-0123

Sept 19, 2024

SCHEDULE E (Form 5471)

(Rev. December 2021)

Department of the Treasury Internal Revenue Service

Attach to Form 5471.

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

Name of person filing Form 5471

Roger Rabbit Inc.

Name of foreign corporation

Foreign Finance Corporation

Identifying number

00-0000004

Reference ID number (see instructions)

ABC1234 GEN

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

Part I Taxes for Which a Foreign Tax Credit Is Allowed

Section 1 — Taxes Paid or Accrued Directly by Foreign Corporation

Table with 6 columns: (a) Name of Payor Entity, (b) EIN or Reference ID Number of Payor Entity, (c) Country or U.S. Possession to Which Tax Is Paid, (d) Foreign Tax Year of Payor Entity, (e) U.S. Tax Year of Payor Entity, (f) U.S. Tax Year of Payor Entity to Which Tax Relates, (g) Income Subject to Tax in the Foreign Jurisdiction, (h) If taxes are paid on U.S. source income, check box, (i) Local Currency in Which Tax Is Payable, (j) Tax Paid or Accrued (in local currency in which the tax is payable), (k) Conversion Rate to U.S. Dollars, (l) In U.S. Dollars (divide column (j) by column (k)), (m) In Functional Currency of Foreign Corporation.

Section 2 — Taxes Deemed Paid by Foreign Corporation

Table with 6 columns: (a) Name of Lower-Tier Distributing Foreign Corporation, (b) EIN or Reference ID Number of Lower-Tier Distributing Foreign Corporation, (c) Country or U.S. Possession to Which Tax Is Paid, (d) PTEP Group (enter code), (e) Annual PTEP Account (enter year), (f) PTEP Distributed (enter amount in functional currency), (g) Total Amount of PTEP in the PTEP Group (in functional currency), (h) Total Amount of the PTEP Group Taxes With Respect to PTEP Group (USD), (i) Foreign Income Taxes Properly Attributable to PTEP and not Previously Deemed Paid ((column (f)/column (g)) x column (h)) (USD).

5 Total (combine lines 1 through 4 of column (i)). Also report amount on Schedule E-1, line 6
6 Total (combine lines 1 through 4 of column (m)). Also report amount on Schedule E-1, line 6

Sept 19, 2024 Tax Year 2024 1120 MeF ATS Scenario 4

Schedule E (Form 5471) (Rev. 12-2021) Name of foreign corporation Foreign Finance Corporation EIN (if any) 00-00000045 Reference ID number (see instructions) ABC1234

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

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

Part III Taxes for Which a Foreign Tax Credit Is Disallowed (Enter in functional currency of foreign corporation.)
1 Name of Payor
2 In functional currency (combine lines 1 and 2)
3 In U.S. dollars (translated at the average exchange rate, as defined in section 990(b)(3) and (4) and regulations (see instructions))

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

IMPORTANT: Enter amounts in U.S. dollars.

Table with columns: (a) Subpart F Income, (b) Tested Income, (c) Residual Income, (d) Suspended Taxes. Rows include: 1a Balance at beginning of year, 1b Beginning balance adjustments, 1c Adjusted beginning balance, 2 Adjustment for foreign tax redetermination, 3a Taxes suspended under anti-splitter rules, 3b Taxes suspended under anti-splitter rules, 4 Taxes reported on Schedule E, Part I, Section 1, line 5, column (i), 5 Taxes carried over in nonrecognition transactions, 6 Taxes reported on Schedule E, Part I, Section 2, line 5, column (i), 7 Other adjustments, 8 Taxes paid or accrued on current income/E&P or accumulated E&P, 9 Taxes deemed paid with respect to inclusions, 10 Taxes deemed paid with respect to actual distributions, 11 Taxes on amounts reclassified to section 959(c)(1) E&P, 12 Other, 13 Balance of taxes paid or accrued, 14 Reserved for future use, 15 Reduction for other taxes not deemed paid, 16 Balance of taxes paid or accrued at the beginning of the next year.

Tax Year 2024
1120 MeF ATS Scenario 4

Name of foreign corporation Foreign Finance Corporation	EIN (if any) 00-0000045	Reference ID number (see instructions) ABC1234
--	----------------------------	---

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

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

	(i) Reclassified section 965(a) PTEP	(ii) Reclassified section 965(b) PTEP	(iii) General section 959(c)(1) PTEP	(iv) Reclassified section 951A PTEP	(v) Reclassified section 245A(d) PTEP	(vi) Section 965(e) PTEP	(vii) Section 965(b) PTEP	(viii) Section 951A PTEP	(ix) Section 245A(d) PTEP	(x) Section 951(a)(1)(A) PTEP
1a										
b										
c										
2										
3a										
b										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										

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Tax Year 2024
1120 MeF ATS Scenario 4
Current Earnings and Profits

Attach to Form 5471.
 Go to www.irs.gov/Form5471 for instructions and the latest information.

OMB No. 1545-0123

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

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

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

Accumulated Earnings & Profits (E&P) of Controlled Foreign Corporation

(Rev. December 2020)

Attach to Form 5471.

Department of the Treasury
 Internal Revenue Service

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

Name of person filing Form 5471

Roger Rabbit Inc.

Identifying number

00-0000004

Name of foreign corporation

Foreign Finance Corporation

EIN (if any)

00-00000045

Reference ID number (see instructions)

ABC1234

GEN

- a** Separate Category (Enter code—see instructions.)
- b** If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)

Part I Accumulated E&P of Controlled Foreign Corporation

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

Important: Enter amounts in functional currency.

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

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Cat. No. 21111K

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

Part I Accumulated E&P of Controlled Foreign Corporation (continued)

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

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

Important: Enter amounts in functional currency.

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

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

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August 24, 2020
DO NOT FILE

Sept 19, 2024
SCHEDULE M
(Form 5471)

Transactions Between Controlled Foreign Corporation
and Shareholders or Other Related Persons

OMB No. 1545-0123

(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

Attach to Form 5471.

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

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

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

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

(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation
1 Sales of stock in trade (inventory)					
2 Sales of tangible property other than stock in trade					
3 Sales of property rights (patents, trademarks, etc.)					
4 Platform contribution transaction payments received					
5 Cost sharing transaction payments received					
6 Compensation received for technical, managerial, engineering, construction, or like services					
7 Commissions received					
8 Rents, royalties, and license fees received					
9 Hybrid dividends received (see instructions)					
10 Dividends received (exclude hybrid dividends, deemed distributions under subpart F, distributions of previously taxed income)					
11 Interest received					
12 Premiums received for insurance or reinsurance					
13 Loan guarantee fees received					
14 Other amounts received (attach statement)					
15 Add lines 1 through 14					
16 Purchases of stock in trade (inventory)					
17 Purchases of tangible property other than stock in trade					
18 Purchases of property rights (patents, trademarks, etc.)					
19 Platform contribution transaction payments paid					
20 Cost sharing transaction payments paid					
21 Compensation paid for technical, managerial, engineering, construction, or like services					
22 Commissions paid					
23 Rents, royalties, and license fees paid					
24 Hybrid dividends paid (see instructions)					
25 Dividends paid (exclude hybrid dividends paid)					
26 Interest paid					
27 Premiums paid for insurance or reinsurance					
28 Loan guarantee fees paid					
29 Other amounts paid (attach statement)					
30 Add lines 16 through 29					

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Tax Year 2024
1120 MeF ATS Scenario 4

Sept 19, 2024

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

Page **2**

Name of person filing Form 5471					Identifying number	
(a) Transactions of foreign corporation	(b) U.S. person filing this return	(c) Any domestic corporation or partnership controlled by U.S. person filing this return	(d) Any other foreign corporation or partnership controlled by U.S. person filing this return	(e) 10% or more U.S. shareholder of controlled foreign corporation (other than the U.S. person filing this return)	(f) 10% or more U.S. shareholder of any corporation controlling the foreign corporation	
31 Accounts Payable						
32 Amounts borrowed (enter the maximum loan balance during the year)—see instructions						
33 Accounts Receivable						
34 Amounts loaned (enter the maximum loan balance during the year)—see instructions	46 001 741 000					

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

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May 6, 2021

Sept 19, 2024

**SCHEDULE O
(Form 5471)**

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

**Tax Year 2024
1120 MeF ATS Scenario 4
Organization or Reorganization of Foreign
Corporation, and Acquisitions and
Dispositions of its Stock**

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

OMB No. 1545-0704

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

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

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

(a) Name of shareholder for whom acquisition information is reported	(b) Address of shareholder	(c) Identifying number of shareholder	(d) Date of original 10% acquisition	(e) Date of additional 10% acquisition
<u>Roger Rabbit Inc.</u>	<u>35 An Street An to n NY 10006</u>	<u>00-0000004</u>	<u>01/10/1990</u>	

Part II To Be Completed by U.S. Shareholders

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

Section A—General Shareholder Information

(a) Name, address, and identifying number of shareholder(s) filing this schedule	(b) For shareholder's latest U.S. income tax return filed, indicate:			(c) Date (if any) shareholder last filed information return under section 6046 for the foreign corporation
	(1) Type of return (enter form number)	(2) Date return filed	(3) Internal Revenue Service Center where filed	
<u>Roger Rabbit Inc.</u>	<u>1120</u>	<u>09/15/2024</u>	<u>Ogden</u>	

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

(a) Name of U.S. officer or director	(b) Address	(c) Social security number	(d) Check appropriate box(es)	
			Officer	Director

Section C—Acquisition of Stock

(a) Name of shareholder(s) filing this schedule	(b) Class of stock acquired	(c) Date of acquisition	(d) Method of acquisition	(e) Number of shares acquired		
				(1) Directly	(2) Indirectly	(3) Constructively
<u>Roger Rabbit Inc.</u>	<u>Common</u>	<u>12/31/2024</u>	<u>P rchase</u>	<u>250</u>		
<u>Roger Rabbit Inc.</u>	<u>Preferred</u>	<u>12/31/2024</u>	<u>P rchase</u>	<u>64 570</u>		

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Cat. No. 612000

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

**Tax Year 2024
1120 MeF ATS Scenario 4**

Sept 19, 2024

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

Page **2**

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

Section D—Disposition of Stock

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

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

Section E—Organization or Reorganization of Foreign Corporation

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

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

Section F—Additional Information

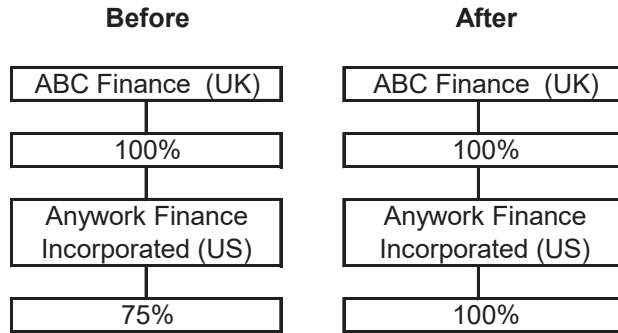
(a) If the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the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

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

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

Form 1120 Test Scenario 4

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



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

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

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

For tax year of the reporting corporation beginning Jan 01, 24, and ending Dec 31, 24

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

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

1a Name of reporting corporation: Roger Rabbit Inc. 1b Employer identification number: 00-0000004 1c Total assets: \$ 250 306 361 000

1d Principal business activity 1e Principal business activity code: 522293 1f Total value of gross payments made or received reported on this Form 5472: \$ 5 000 000 1g Total number of Forms 5472 filed for the tax year: 1 1h Total value of gross payments made or received reported on all Forms 5472: \$ 5 000 000

1i Check here if this is a consolidated filing of Form 5472: [] 1j Check here if this is the initial year for which the U.S. reporting corporation is filing a Form 5472: [x] 1k Total number of Parts VIII attached to Form 5472: 1 1l Country of incorporation: US

1m Date of incorporation 1n Country(ies) under whose laws the reporting corporation files an income tax return as a resident: US 1o Principal country(ies) where business is conducted: US

2 Check here if, at any time during the tax year, any foreign person owned, directly or indirectly, at least 50% of (a) the total voting power of all classes of the stock of the reporting corporation entitled to vote, or (b) the total value of all classes of stock of the reporting corporation: [x] 3 Check here if the reporting corporation is a foreign-owned domestic disregarded entity (foreign-owned U.S. DE) treated as a corporation for purposes of section 6038A: []

Part II 25% Foreign Shareholder (see instructions)

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

4a Name and address of direct 25% foreign shareholder: ABC Finance Corporation 13 Some here Birmingham UK 126375 4b(1) U.S. identifying number, if any: 00-0000021 4b(2) Reference ID number (see instructions) 4b(3) FTIN, if any (see instructions)

4c Principal country(ies) where business is conducted: UK 4d Country of citizenship, organization, or incorporation: UK 4e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident: UK

5a Name and address of direct 25% foreign shareholder 5b(1) U.S. identifying number, if any 5b(2) Reference ID number (see instructions) 5b(3) FTIN, if any (see instructions)

5c Principal country(ies) where business is conducted 5d Country of citizenship, organization, or incorporation 5e Country(ies) under whose laws the direct 25% foreign shareholder files an income tax return as a resident

6a Name and address of ultimate indirect 25% foreign shareholder 6b(1) U.S. identifying number, if any 6b(2) Reference ID number (see instructions) 6b(3) FTIN, if any (see instructions)

6c Principal country(ies) where business is conducted 6d Country of citizenship, organization, or incorporation 6e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

7a Name and address of ultimate indirect 25% foreign shareholder 7b(1) U.S. identifying number, if any 7b(2) Reference ID number (see instructions) 7b(3) FTIN, if any (see instructions)

7c Principal country(ies) where business is conducted 7d Country of citizenship, organization, or incorporation 7e Country(ies) under whose laws the ultimate indirect 25% foreign shareholder files an income tax return as a resident

Sept 19, 2024

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Form 5472 (Rev. 12-2023)

Page 2

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

8a Name and address of related party

ABC Finance 13 Some here Birmingham UK 126375

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

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

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

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

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

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

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

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

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

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

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

Tax Year 2024
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Part VII Additional Information. All reporting corporations must complete Part VII.

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

Part VIII Cost Sharing Arrangement (CSA)

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

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

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

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

Entity Classification Election

Department of the Treasury
Internal Revenue Service

Information about Form 8832 and its instructions is at www.irs.gov/form8832.

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

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

Part I Election Information

1 Type of election (see instructions):

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

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

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

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

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

3 Does the eligible entity have more than one owner?

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

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

- a Name of owner Roger Rabbit Inc.
- b Identifying number of owner 00-0000004

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

- a Name of parent corporation _____
- b Employer identification number _____

Part I Election Information (Continued)

6 Type of entity (see instructions):

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

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

8 Election is to be effective beginning (month, day, year) (see instructions) 12/31/2024

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

Consent Statement and Signature(s) (see instructions)

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

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

Part II Late Election Relief

11 Provide the explanation as to why the entity classification election was not filed on time (see instructions).

Multiple horizontal lines for providing an explanation.

Under penalties of perjury, I (we) declare that I (we) have examined this election, including accompanying documents, and, to the best of my (our) knowledge and belief, the election contains all the relevant facts relating to the election, and such facts are true, correct, and complete. I (we) further declare that I (we) have personal knowledge of the facts and circumstances related to the election. I (we) further declare that the elements required for relief in Section 4.01 of Revenue Procedure 2009-41 have been satisfied.

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

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

OMB No. 1545-1910

(Rev. December 2024)

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

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 140

Name of person filing this return

Roger Rabbit Inc.

Filer's identifying number

00-0000004

Number, street, or other address (or P.O. box number if mail is not delivered to street address)

35 An Street

City or town, state, and ZIP code

An ton NY 10006

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

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

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

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

1a Name and address of FDE or FB

DEF International Finance 1000 Helmstraat Maastricht Limburg/Netherlands 6211TA

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

00-0000017

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

Netherlands Foreign Entity

d Date(s) of organization

12/31/2018

e Effective date as FDE

03/31/2019

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

a Country in which principal business activity is conducted

h Principal business activity code number

i Principal business activity

j Functional currency

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

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

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

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

a Name and address

ABCDEF Finance Corporation 14 Some here Birmingham England 126375

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

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

00-0000022

c(2) Reference ID number (see instructions)

d Country under whose laws organized

e Functional currency

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

a Name and address

b Country under whose laws organized

c U.S. identifying number, if any

d Functional currency

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

Schedule C Income Statement (see instructions)

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

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

Schedule C-1 Section 987 Gain or Loss Information

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

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

Schedule F Balance Sheet

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

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash and other current assets	1	
2	Other assets	2	
3	Total assets	3	
Liabilities and Owner's Equity			
4	Liabilities	4	
5	Owner's equity	5	
6	Total liabilities and owner's equity	6	

Schedule G Other Information

	Yes	No
1		✓
2		✓
3		
4		✓
5		✓

Schedule G Other Information (continued)

		Yes	No
6	Is the FDE or FB a qualified business unit as defined in section 989(a)?		✓
<i>Do not complete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers of FBs and FDEs.</i>			
7a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amount determined as a base erosion payment under section 59A(1) or have a base erosion tax benefit under section 59A(c)(2) from a foreign person, with which a related party of the taxpayer? See instructions. If "Yes," complete lines 7b and 7c.		✓
b	Enter the total amount of the base erosion payments \$ _____		
c	Enter the total amount of the base erosion tax benefit \$ _____		
8a	During the tax year, did the FDE or FB pay or accrue the payment of, or any amount determined as a base erosion payment under section 59A(c) or have a base erosion tax benefit under section 59A(c)(2) from a foreign person, with which a related party of the taxpayer? See instructions. If "Yes," complete lines 8b and 8c.		✓
b	Enter the total amount of the base erosion payments \$ _____		
c	Enter the total amount of the base erosion tax benefit \$ _____		
9	<i>Answer only if the tax owner of the FDE or FB is a CFC: Were there any intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the tax year in which the FDE or FB acted as a manufacturer, seller, distributor, or purchaser of goods? Answer the remaining questions in Schedule G only if the tax owner of the FDE or the interest in the FDE is a U.S. corporation. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDE is treated as a U.S. corporation solely for purposes of these questions.</i>		
10a	If the FB or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4)(i) and is part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		✓
b	If "Yes," enter the amount of the dual consolidated loss \$ _____		
11a	If the FB or the interest in the FDE is a separate unit and part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c.		✓
b	Enter the amount of the dual consolidated loss for the combined separate unit \$ _____		
c	Enter the net income (loss) attributed to the dual consolidated FB of the individual interest in the FDE as determined under Regulations section 1.1503(d)-5(c)(1)(ii) \$ _____		
12a	Was any portion of the dual consolidated loss on line 10b or 11b taken into account in computing U.S. taxable income for the year? If "Yes," go to line 12b. If "No," go to line 13.		✓
b	Was this a permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6? If "Yes," see the instructions and go to line 12c. If "No," go to line 12d.		
c	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section 1.1503(d)-6 attached to the return? After answering this question, go to line 13a.		
d	If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e.		
e	Enter the separate unit's contribution to the cumulative consolidated taxable income ("cumulative register") as of the beginning of the tax year \$ _____. See instructions.		
13a	During the tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) requiring recapture of any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or as part of a combined separate unit, in any prior tax years?		✓
b	If "Yes," enter the total amount of recapture \$ _____. See instructions.		
14a	During the tax year, did the FDE or FB pay or accrue any Top-up Tax? See instructions.		✓
b	If "Yes," enter the amount of Top-up Tax paid or accrued.		
	(1) Income Inclusion Rule (IIR) (or similar taxes) \$ _____		
	(2) Qualified Domestic Minimum Top-up Tax (QDMTT) (or similar taxes) \$ _____		
	(3) UTPR (or similar taxes) \$ _____		

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

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

1	Current year net income (loss) per foreign books of account	1	
2	Total net additions	2	
3	Total net subtractions	3	
4	Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	4	
5	DASTM (line 4) (if applicable)	5	
6	Combine lines 4 and 5	6	
7	Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average exchange rate determined under section 981(b), and the rate of negotiation (see instructions))	7	
8	Enter exchange rate used for line 7		

Schedule I Transferred Loss Amount

Important: See instructions for when to complete this section.

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

Schedule J Income Taxes Paid or Accrued (see instructions)

(a) Country or territory	Foreign Income Taxes				Foreign Tax Credit Separate Categories			
	(b) Foreign tax year (YYYY-MM-DD)	(c) Foreign currency	(d) Conversion rate	(e) U.S. dollars	(f) Foreign branch	(g) Passive	(h) General	(i) Other
Totals								

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

OMB No. 1545-1910

(Rev. December 2024)

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

Department of the Treasury Internal Revenue Service

Information furnished for the FDE's or FB's annual accounting period (see instructions)

Attachment Sequence No. 140

beginning , 20 , and ending , 20

Name of person filing this return

Roger Rabbit Inc.

Filer's identifying number

00-0000004

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

35 An Street

City or town, state, and ZIP code

An to n NY 10006

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

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

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

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

1a Name and address of FDE or FB

B gs B nn Inc. 36 An here A e. Port Vila Van at

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

00-0000018

b(2) Reference ID number (see instructions)

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

Van at Corporation Entit

d Date(s) of organization

06/18/2018

e Effective date as FDE

03/31/2019

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

g Country in which principal business activity is conducted

h Principal business activity code number

i Principal business activity

j Functional currency

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

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

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

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

a Name and address

Jessica Rabbit Inc. 37 An place Bl d. Port Erin Isle of Man IM9 6AF

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

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

c(2) Reference ID number (see instructions)

C185038-23

d Country under whose laws organized

Isle of Man

e Functional currency

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

a Name and address

b Country under whose laws organized

c U.S. identifying number, if any

d Functional currency

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

Schedule C Income Statement (see instructions)

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

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

Schedule C-1 Section 987 Gain or Loss Information

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

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

Schedule F Balance Sheet

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

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash and other current assets	1	
2	Other assets	2	
3	Total assets	3	
Liabilities and Owner's Equity			
4	Liabilities	4	
5	Owner's equity	5	
6	Total liabilities and owner's equity	6	

Schedule G Other Information

	Yes	No
1		✓
2		✓
3		
4		✓
5		✓

Schedule G Other Information (continued)

		Yes	No
6	Is the FDE or FB a qualified business unit as defined in section 989(a)?		✓
<i>Do not complete lines 7 and 8 if you are an individual who owns an FB or FDE directly or through tiers of FBs and FDEs.</i>			
7a	During the tax year, did the FDE or FB receive, or accrue the receipt of, any amount deemed to be a base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) from a foreign person, with which a related party of the taxpayer? See instructions. If "Yes," complete lines 7b and 7c.		✓
b	Enter the total amount of the base erosion payments \$ _____		
c	Enter the total amount of the base erosion tax benefit \$ _____		
8a	During the tax year, did the FDE or FB pay or accrue the payment of, or any amount deemed to be a base erosion payment under section 59A(c) or have a base erosion tax benefit under section 59A(c)(2) from a foreign person, with which a related party of the taxpayer? See instructions. If "Yes," complete lines 8b and 8c.		✓
b	Enter the total amount of the base erosion payments \$ _____		
c	Enter the total amount of the base erosion tax benefit \$ _____		
9	<i>Answer only if the tax owner of the FDE or FB is a CFC: Were there any intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the tax year in which the FDE or FB acted as a manufacturer, seller, distributor, or purchaser of goods? Answer the remaining questions in Schedule G only if the tax owner of the FDE or FB is a U.S. corporation. Answer questions 10a through 11c if the tax owner of the FB or the interest in the FDE is treated as a U.S. corporation solely for purposes of these questions.</i>		
10a	If the FB or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(4)(i) and is part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		✓
b	If "Yes," enter the amount of the dual consolidated loss \$ _____		
11a	If the FB or the interest in the FDE is a separate unit and part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c.		✓
b	Enter the amount of the dual consolidated loss for the combined separate unit \$ _____		
c	Enter the net income (loss) attributed to the dual consolidated FB of the individual interest in the FDE as determined under Regulations section 1.1503(d)-5(c)(1)(ii) \$ _____		
12a	Was any portion of the dual consolidated loss on line 10b or 11b taken into account in computing U.S. taxable income for the year? If "Yes," go to line 12b. If "No," go to line 13.		✓
b	Was this a permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6? If "Yes," see the instructions and go to line 12c. If "No," go to line 12d.		
c	If "Yes," is the documentation that is required for the permitted domestic use under Regulations section 1.1503(d)-6 attached to the return? After answering this question, go to line 13a.		
d	If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e.		
e	Enter the separate unit's contribution to the cumulative consolidated taxable income ("cumulative register") as of the beginning of the tax year \$ _____. See instructions.		
13a	During the tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) requiring recapture of any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or as part of a combined separate unit, in any prior tax years?		✓
b	If "Yes," enter the total amount of recapture \$ _____. See instructions.		
14a	During the tax year, did the FDE or FB pay or accrue any Top-up Tax? See instructions.		✓
b	If "Yes," enter the amount of Top-up Tax paid or accrued.		
	(1) Income Inclusion Rule (IIR) (or similar taxes) \$ _____		
	(2) Qualified Domestic Minimum Top-up Tax (QDMTT) (or similar taxes) \$ _____		
	(3) UTPR (or similar taxes) \$ _____		

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

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

1	Current year net income (loss) per foreign books of account	1	
2	Total net additions	2	
3	Total net subtractions	3	
4	Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	4	
5	DASTM (line 4) (if applicable)	5	
6	Combined lines 4 and 5	6	
7	Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average exchange rate determined under section 981(b), and the rate of negotiation (see instructions))	7	
8	Enter exchange rate used for line 7		

Schedule I Transferred Loss Amount

Important: See instructions for when to complete this section.

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

Schedule J Income Taxes Paid or Accrued (see instructions)

(a) Country or territory	Foreign Income Taxes				Foreign Tax Credit Separate Categories			
	(b) Foreign tax year (YYYY-MM-DD)	(c) Foreign currency	(d) Conversion rate	(e) U.S. dollars	(f) Foreign branch	(g) Passive	(h) General	(i) Other
Totals								

Country-by-Country Report

For reporting period beginning , 20 , and ending , 20

Go to www.irs.gov/Form8975 for instructions and the latest information.

If this is an amended report, check here

Enter the number of Schedules A (Form 9975) attached to this Form 8975 3

Part I Identification of Filer

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

Part II Additional Information

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

Established in 1927 in Honol I Roger Rabbit Inc. is a financial ser ices compan orking ith indi id als and companies orld ide. We ha e 16 offices located in the US UK and Isle of Man. O r in estment strategies and financial ad ice are al a s tailored to meet o r client's specific needs beca se e ant to add al e to their compan or organi ation. We ha e the skills to attract other in estors hich introd ces o r ide range of clients to ne so rces of capital. We gi e o r clients the abilit to do their b siness better. We ha e been s ccessf I for 90 ears beca se of the dedication each of o r trained financial anal sts pro ides to o r c stomers. When pairing that s perior ser ice ith constant inno ation o r clients in. We f ll anal e the credit strengths of each of o r clients and de lop a f nding plan specific to them. Se eral of o r offices aro nd the orld also pro ide additional f nding options to o r clients b offering access to go ernment mortgage ins rance and loan g arantee programs. Here e combine in estment banking and mortgage banking ser ices hich sa es o r clients time and red ces o erall costs. Roger Rabbit Inc offers a ide ariet of financial prod cts that enables companies and indi id als to manage the le el of risk the are comfortable ith. We also broaden their access to both foreign and domestic capital markets. O r tailored ad ice helps nlock pri ate sector in estments hich clients need if the ant to e pand their b sinesses create jobs thro gho t their companies and gro economies all o er the orld. Roger Rabbit Inc s Instit tional Asset Management Sol tions are comprised of a ll range of integrated technologies. These are designed to help o r clients impro e operational efficiencies in all areas of their b siness. We le erage the ad anced technolog ithin o r compan to dell er better ser ice prod cts and ad ice to o r client s companies. It is designed ith o r clients and their in estors in mind and has a pro en track record of red cing man al processes mitigating errors and risks and impro ing operational efficiencies. We al a s ha e sec rit in mind hich is h this is all done in a protected en ironment. We help o r clients eliminate man al tasks and preser e that time to foc s on hat the do best: ork ith their c stomers to achie e their goals. We sta constantl apprised of reg lations and

Tax Jurisdiction and Constituent Entity Information

OMB No. 1545-2272

For reporting period beginning _____, 20____, and ending _____, 20____

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

Name of the reporting entity: Roger Rabbit Inc. EIN: 00-0000004

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

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

Part II Constituent Entity Information

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

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 69310N

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

