

**Taxpayer Name:**  
**TIN:**  
**Tax Form:**  
**Tax Year (s):**

**Examiner:**  
**Date:**

**PFIC Risk Analysis Workpaper**

**Factors to Consider**

1. The number and size of PFIC transactions.
2. The additional tax in relation to total tax including the 5%, 12.5%, 20% (2009 OVDI), 25% (2011 OVDI), or 27.5% (2012 and Forward OVDI) offshore miscellaneous penalty.
3. The source of the funds (concealed income, inheritance, etc.)
4. When considering PFIC income derived under the Mark to Market election, any increase in value should be compared to offsetting losses in subsequent year due to decrease in market value.

**PFIC:**

Not present in this case     PFIC present in this case

**The factors above were considered along with the individual facts and circumstance of this case and the following determination was made:**

Addressing PFIC transactions in this case will not result in additional material tax therefore will not be pursued further.

PFIC transactions were determined to be material in this case and will be pursued in this case.

**Comments**

**Group Manager Concurrence**

**Initials** \_\_\_\_\_ **Date** \_\_\_\_\_