

Pension Digest

ALSO IN THIS ISSUE -

Inherited IRA – Sample Pass-Through Language for Legal Opinion, *Page 2*

Direct Rollovers from a 401(k) Plan – Sometimes Two is Better Than One, *Page 3*

No Time Limit for When a Spouse Beneficiary Must Elect to Treat Deceased Spouse's IRA as Own, *Page 5*

How and When to Complete the Form 1096, *Page 5*

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"The Pension Specialists"



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Fee Disclosures and IRA Projection Schedule Requirements

An IRA custodian/trustee must make a full and complete disclosure of the fees it charges its IRAs and/or IRA accountholders for rendering various IRA services. There are no exceptions. If your institution has been lax with respect to its fee disclosures, now is the time to adopt the proper administrative procedures.

If an IRA custodian would assess an IRA an unauthorized fee, it would be a prohibited transaction under Internal Revenue Code section 4975. A 15% excise tax would be owed by the IRA custodian (total amount of unauthorized fees x 15%). If the IRA custodian did not correct its error prior to discovery by the IRS (or possibly a bank examiner), there would also be an additional 100% tax. In theory, the law has been written to encourage self-correction.

Fee disclosures and what type of financial disclosure the IRA custodian/trustee must furnish are two intertwined subjects. An IRA custodian or IRA trustee must furnish one of two financial disclosures to the individual who is setting up his or her new IRA. The IRA custodian must determine which financial disclosure it must furnish. This depends upon the type of IRA being established and the investments of such IRA.

There are three general types of IRAs: custodial; trust and custodial self-directed. Custodial means the

IRA accountholder is offered savings or time deposits offered by the financial institution serving as the IRA custodian. Trust means an IRA set up with a financial institution with trust powers. Generally, the IRA assets will be invested in stocks, bonds, mutual funds, real estate, etc. With a trust IRA, the financial institution may be responsible to invest the IRA assets or may allow the IRA grantor to self-direct the assets. A custodial IRA is generally offered by an institution without trust powers. In such cases, it may render no investment advice.

Internal Revenue Code regulation 1.408-6 sets forth the requirements for the Disclosures statement. An IRA custodian must furnish the new IRA accountholder with an IRA disclosure statement. This regulation was adopted by the IRS on August 7, 1980. It has not been changed since to reflect the many IRA law changes enacted from 1980-2009. There are three sections to an IRA Disclosure statement: a revocation section, a financial disclosure section and a plain-English explanation of the IRA rules and procedures set forth in the IRA plan agreement. This IRA regulation is a consumer disclosure regulation. The terms of the IRA plan agreement, including the assessment of fees, are to be explained in plain-english.

Some financial institutions in the 1970's portrayed growth in an unrea-

Continued on page 2



Fee Disclosures Continued from page 1

sonable way just as some do today. In order to reinin overly optimistic marketing of IRAs (i.e.unrealistic large balances at ages 60, 65 and 70), the IRA regulation states a financial projection showing the growth in the account over time is only required (and allowed) to be furnished when the earnings of the IRA are either guaranteed or the growth in the IRA can reasonably be determined. And then, there are rules to be applied in preparing the projection schedule, including the rule that if the IRA custodian charges any fees, such projection schedules must reflect such fees. For those situations where the earnings of the IRA are not guaranteed or cannot be reasonably projected, (e.g. investments comprised of stocks, bonds, mutual funds, real estate, variable annuities, etc.), the regulation requires a different type of financial disclosure. It must set forth:

- Each type of charge (i.e. sales fee, set-up fee, transfer, etc), and the amount thereof, which may be made against a contribution;
- 2. The method for computing and allocating annual earnings;
- 3. Each charge, in addition to those already disclosed with respect to contributions, which may be applied to such account in determining the net amount of money available to the IRA accountholder and the method of computing each such charge. This means all fees must be listed or disclosed; and
- 4. A statement that the growth in the value of the IRA is neither guaranteed nor projected.

The IRA regulation requires each and every fee which may affect the final balance of an IRA be disclosed. Disclosed in this sense means there must be an explanation of how each fee is calculated, when it is calculated and when it will be assessed. It must be clearly explained when a certain type of fee must be paid by the IRA versus those fees which the IRA custodian will allow the IRA accountholder to pay directly to the IRA custodian. And if such fees aren't paid in a timely fashion, then the IRA custodian will withdraw such fees from the IRA.

The regulation is unclear, whether for purposes of deciding which financial disclosure the IRA custodian/trustee must furnish, the determination is based solely on how the initial contribution is first invested or how the IRA funds will be invested once the seven day revocation period has expired. For self-directed IRAs and trust IRAs, we at CWF believe it is the nature of the investment(s) after the seven day revocation period which determines which financial disclosure must be furnished. For example, if the initial contribution is invested in a variable money market account since the IRA accountholder intends to self-direct such funds be invested in the stock market or mutual funds within the next 30-120 days depending upon market performance, we at CWF do not believe the growth in the IRA can be reasonably projected. This means the second type of financial disclosure must be furnished. The most important thing is that the IRA custodian have a full and complete explanation of all fees and charges which will apply to the IRA.

It should be noted that the IRS does not mention the topic of "financial disclosure" anywhere in Publication 590 (IRAs). We do not believe this is a coincidence. The last 29 years have shown that interest rates, stock values and other investment values can and do fluctuate greatly.

This article has discussed the financial disclosure rules and procedures for trust IRAs and custodial self-directed IRAs. A future article will discuss the rules and procedures for "deposit account" IRAs. •

Inherited IRA – Sample Pass-Through Language for Legal Opinion

Mary Doe has maintained an IRA with ABC Institution since 1979. She was born on 2-16-33. She died in July of 2009, at age 76. She had designated her husband as her primary beneficiary. He had died in 2008. She had not designated any contingent beneficiary(ies). Her IRA plan agreement indicated her estate was the default beneficiary. Mary's 3 children were each to receive a 1/3 share



Inherited IRAs Continued from page 2

of her estate. The three children are - Nancy, John, and Mark. Nancy is the personal representative of the estate.

ABC Institution will set up the inherited IRA and title it, "The Mary Doe Estate as beneficiary of Mary Doe's IRA." The tax rules do not require the estate to take a lump sum distribution. The life distribution rule applies, but the RMD distribution period will be based on Mary since her estate was her beneficiary. The factor from the Single Life Table is 12.7 since Mary was age 76 in 2009.

Nancy will want to check with the attorney assisting her with the estate. It may well be possible under applicable state law for the estate to pass-through to each beneficiary the right to receive these future IRA distributions in such a way that the IRA custodian is able to set up an inherited IRA for each beneficiary. We at CWF believe the IRA custodian could set up 3 inherited IRA for the three beneficiary's if an attorney would furnish a legal opinion to the effect:

"Pursuant to Mary Doe's will, federal law and the laws of the State of XXX, it is permissible for Mary Doe's estate to pass-through to the estate's three beneficiaries the right to receive the future IRA distributions to which Mary Doe's estate is entitled to receive in distributions over the life expectancy of Mary. That is, the IRA custodian is authorized to establish an inherited IRA for each beneficiary of the estate and close out the estate's inherited IRA. The three inherited IRA accounts would be titled, Nancy as beneficiary of Mary Doe's IRA; John as beneficiary of Mary Doe's IRA; and Mark as beneficiary of Mary Doe's IRA. However, since Mary died after her required beginning date with her estate as her beneficiary, all three beneficiaries will use an RMD distribution period based on Mary's age. Since Mary attained or would have attained age 76 in 2009, then the divisor for 2010 will be 11.7 (12.7 -1.0). The divisor for 2011 will be 10.7, for 2012 will be 9.7, etc. Each beneficiary, of course, could withdraw in a year an amount larger than the RMD amount.

Direct Rollovers from a 401(k) Plan – Sometimes Two is Better Than One

IRA custodians are starting to receive two rollovers for the same individual from the same 401(k) plan. This article discusses one such situation. The duties of the IRA custodian are actually quite simple, make sure you get the correct amounts into the right IRA type. Don't mix-up the direct rollover amounts. The primary tax reporting duties belong to the individual (and the tax advisor) and not the IRA custodian.

Many individuals are fortunate to participate in a 401(k) plan. Many 401(k) plans now allow the participants to make Designated Roth elective deferrals in addition to "regular" elective deferrals. The goal in making Roth IRA contributions is to have the income earned be tax-fee when distributed. The same goal applies to Designated Roth accounts within 401(k) plans. The individual wants the income to be tax-free when it is ultimately distributed from the 401(k) plan.

Each year the number of 401(k) participants making both types of deferrals is increasing. For discussion purposes, we will discuss the situation of Carol Wind. She recently retired from ABC institution. She is age 66. ABC institution is the sponsor of a 401(k) plan which has allowed both types of elective deferrals since 2006. Carol has a total 401(k) account balance of \$84,000. Her "regular" 401(k) account has a balance of \$54,000. This is comprised of her regular deferrals, earnings/losses and employer matching contributions. She also has \$30,000 in her designated Roth account. Her basis in this account is \$36,000 as the account has suffered investment losses (\$6,000) over the last few years.

She is entitled to receive a distribution of her two accounts. She has decided she will directly rollover the "regular" 401(k) account balance (\$54,000) to a traditional IRA and the Designated Roth account balance (\$30,000) to a Roth IRA. Both IRAs will be with ABC Institution. She has an existing traditional IRA. She will be establishing a



Direct Rollovers, Continued from page 3

new Roth IRA and she has no other Roth IRAs. Carol will not convert via a direct rollover the "regular" 401(k) account balance to her Roth IRA.

Once the funds have been directly rolled over, she intends to withdraw \$8,000 from one or both of her IRAs.

Carol has asked from which should she withdraw the \$8,000.

There is no right answer. It will depend upon her goals.

If she takes the \$8,000 distribution from her traditional IRA, she will include the \$8,000 in her 2009 income. She will pay income tax at her applicable marginal tax rate. The 10% additional tax is not owed since she is age 63. If she takes the \$8,000 distribution from her Roth IRA, she will be withdrawing her basis from the Roth IRA. She will not need to include this amount in her income. However, the Roth IRA account balance will be smaller than it otherwise would have been and the chance to earn future tax-free earnings will have been lessened.

Lucy, as other individuals moving Designated Roth 401(k) funds into a Roth IRA, should be aware of the following rule. In order to determine if a subsequent distribution from her Roth IRA is a tax-free (i.e. qualified), she must meet the 5 year requirement solely within her Roth IRA(s). The law does not allow the individual to aggregate any time period earned within the 401(k) plan with any time period earned within the Roth IRA for purposes of determining if the distribution from the Roth IRA is a qualified distribution. For purposes of the 5 year rule, the period starts on January 1 of the year of the direct rollover or rollover, or, if earlier, January 1 of the year for which she had made her first Roth IRA contribution.

In this situation, the distribution of the entire Designated Roth account within the 401(k) plan (i.e. direct rollover to a Roth IRA) is not a qualified distribution since the five-year rule has not been met. Designated Roth elective deferrals only started as of January 1, 2006. In this situation she has withdrawn a nontaxable basis of \$8,000 and she

will not have to include this amount in her income. Earnings are distributed from a Roth IRA only once all regular and conversion contributions have been withdrawn. All Roth IRAs wherever located are aggregated for this calculation.

The Roth IRA custodian is not required to maintain a breakdown (basis vs. earnings) of the funds directly rolled in from the 401(k) plan. The 401(k) administrator must inform her that with respect to the \$30,000, her basis is \$30,000. In effect she has had negative earnings of \$6,000. It is up to Lucy and her tax advisor to keep track of and apply the rules regarding withdrawing basis or earnings from the Roth IRA. If she would withdraw "earnings" from her Roth IRA prior to satisfying the five year rule, these "rolled over" earnings would be taxable since the distribution would not be a qualified distribution.

Note that there will come a time when a distribution to a person with a designated Roth account will be "qualified". But since such contributions first started in 2006, the tax free status is not possible until 2011. If the distribution of the earnings (and the basis) are tax free, then the entire account becomes "basis" when rolled over into a Roth IRA.

In summary, IRA custodians will be having more customers who are participants in 401(k) plans who will need to make two direct rollover contributions. Carol is such a customer. She will direct rollover \$54,000 into her traditional IRA and \$30,000 into her Roth IRA. Administratively, an IRA custodian would like to be furnished a copy of the 401(k) distribution form Carol completed to instruct to make these two direct rollovers. If you cannot obtain this form, then have her complete a rollover certification form. •



No Time Limit for When a Spouse Beneficiary Must Elect to Treat Deceased Spouse's IRA as Own

A spouse who is the sole beneficiary of his or her deceased spouse's IRA always has the right to treat it as his or her own regardless of the fact that either the five year rule or the life distribution rule applied to the inherited IRA.

A typical situation would be. John Doe died at age 67 in 2009. He was born on June 10, 1942. His wife, Jane, is his sole beneficiary. she was born on February 27, 1954. She will attain age 59½ on August 27, 2011.

Jane may need to withdraw funds prior to age 59½. Therefore, she would want to maintain the IRA as an inherited IRA. She does not want to treat his IRA as her own in 2009 or 2010. She will not owe the 10% tax if she withdraws the funds from an inherited IRA; she will owe the 10% tax if she treats his IRA as her own and then takes a distribution. Because John died before his required beginning date, she must take her first RMD distribution under the life distribution rule by December 31, 2012 (the year he would have attained age 70½) She most likely will want to treat John's IRA as her own IRA on August 27, 2011 (i.e. when she attains age 59½). ◆

How and When to Complete the Form 1096

Form 1096 is the transmittal form to be used with numerous IRS information reporting forms. The title for this form is "Annual Summary and Transmittal of U.S. Information Return." A financial institution will primarily use Form 1096 to send to the IRS its copies of the corrected 5498 forms and 1099 forms it has prepared. The Form 1096 is not furnished to the individual. The IRS has created the Form 1096 as an administrative tool allowing it to efficiently process IRS information reporting forms submitted via print forms.

A financial institution has the duty to prepare a corrected information return when it learns that the original form contains an error. Many financial institutions are required to file one or more of their original information returns electronically since they have 250 or more returns to be filed for that specific information return. However, many institutions do not have 250 or more corrected returns and so they are not required to filed their "corrections" electronically. Many will choose to file "print" versions. When they do so, they will use the Form 1096 as the transmittal form for sending the IRS copies to the IRS. The financial institution, of course, will use the print version to furnish the taxpayer with his or her copy of the corrected form. Many smaller financial institutions are not required to filed the original information returns electronically since they are not required to file electronically when they do not have the 250 or more copies of such forms. These financial institution will prepare print versions of the information returns and will send them to the IRS with the Form 1096 as the transmittal form.

The Form 1096 is NOT to be used to transmit the information returns when the forms have been filed electronically. Form 4804, Transmittal of Information Returns Reported Magnetically/ Electronically is to be used. In plain English, a financial institution is not permitted to send the Form 1096 and/or underlying print forms to the Enterprise Computing Center - Martinsburg (ECC-MTB). The only submissions to be made to Martinsburg are electronic submissions.

Set forth are the 2008 and 2009 versions of Form 1096. The IRS prints special "red ink" version of the information forms. They contain a magnetic ink. To process these forms, the IRS scans such forms. Such forms must be generally be ordered from the IRS since any copies printed on general computer printers will not contain such special ink. Any attempted submission of non-red forms would not qualify as a correct submission. These "red" forms may be ordered from the IRS. This can be done online at www.irs.gov http://www.irs.gov. In the



Form 1096, Continued from page 5

search area, insert - online ordering for information returns and employer returns.

The purpose of this article is to discuss the completing of Form 1096 with respect to the following forms:

Form 5498 IRA Contribution Information

Form 5498-SA HSA, Archer MSA or

Medicare+Choice MSA

Information

Form 5498-ESA Coverdell ESA Contribution

Information Form 1099-R Distributions From Pensions, Annuities, Retirement or Profit Sharing Plans, IRAs, Insurance

Contracts, Etc.

Form 1099-SA Distributions From a HSA,

Archer MSA, or Medicare Advantage MSA Form

1099-Q Payments from Qualified

Education Programs (Under

Sections 529 and 530)

Completing much of Form 1096 for these 6 information returns is self-evident, but there are times when additional guidance is helpful. A separate Form 1096 must be prepared for each type of form to be filed on a per year basis. For example, if the institution will be filing 15 corrected 2008 Form 5498's, 9 corrected 2008 Form 1099-R's and 4 corrected 2007 Form 5498's, then it will need to prepare 3 separate Form 1096's. There will be two 2008 1096's and one 2007 Form 1096. There will be a group or package prepared for the information returns of the same type along with the appropriate Form 1096. It is permissible for an institution to include all three groups within the same envelope. The mailing must be a "flat" mailing as the IRS may not be able to process the submission if there are "folded" copies.

It may seem strange, but the IRS procedures do allow a financial institution filing the print versions of an information return to submit original forms along with the corrected forms or vice versa. For example, the 9 "corrected" 2008 1099-R's might be comprised of seven corrected Form 1099-R's

because an error had been made in reporting the correct amount of the distribution in box 1 and two original Form 1099-R's since there had been two distributions initially incorrectly reported as a non-reportable transfer. •

Discussion of the Boxes on Form 1096

Top Left Corner and Box 1 or 2.

The Filer's Name, address, and identifying number are to be completed. The Filer is the financial institution (e.g. trustee or issuer) of the original information form. The IRS sends most financial institutions the Package 1096 with a preprinted label. The IRS wants the financial institution to use the preprinted label. Since it contains the employer identification number there is no need to complete box 1 or box 2. However, both the 2008 and 2009 instructions contain the following statement, "If ANY of the preprinted information is incorrect, make corrections on the form." For emphasis purposes, we have capitalized "any". It does not matter if the error is in the filer's name, addresses or employer identification number. The IRS does not want the label to be used if there is an error in any of these items. If there is any error, the financial institution will need to complete top left section. Instructions for prior years had allowed a filer to use the label, and then write on the label its changes to its name or address.

If a financial institution is not using the preprinted label, it must enter it name, address and then either the employer identification number or social security number. Do not fill in both boxes 1 and 2. In some years a financial institution may need to make more than one set of corrections. There will no label to use for second or third submissions of corrections and so this information needs to be completed on the Form 1096.

Box 3 - Total Number of Forms.

Enter the number of forms being sent or transmitted with this particular Form 1096. Remember, that the IRS sheet containing 3 forms may include both corrections and originals. Enter the number of cor-



Boxes on Form 1096, Continued from page 6

rectly completed forms being transmitted and not the number of sheets or pages. For example, if you would send two pages of three-to-a-page Form 5498 with a Form 1096 and you have prepared five Forms 5498 on those two pages, enter "5" in box 3. Do not include any blank or voided forms or the Form 1096 in your box 3 total.

Box 4 - Federal Income Tax Withheld.

With respect to the 1099 forms, if there has been any withholding of federal income tax shown on such forms, the amount needs to be totaled and entered in this box 4.

Box 5 - Total Amount Reported With Form 1096.

The primary purpose of writing this article is to give additional guidance for completing Box 5. The title is confusing and misleading. It is certainly not clear what is the "total" to be reported on line 5 for a Form 5498. Different amounts are reported for different information forms. Here is our discussion. The IRS listing on what is to be reported in box 5 for the various information forms is set forth in the adjacent column.

For Form 5498, box 5 is to be completed with the TOTAL (i.e. SUM) of the amounts from boxes 1 (traditional IRA contributions, 2 (rollovers), box 3 (conversion contributions), box 4 recharacterized contributions, box 5 (fair market value), box 8 (SEP-IRA contributions), Box 9 (SIMPLE-IRA contributions) and Box 10 (Roth IRA contributions). Prior to 200 1 the amount reported in box 5 was the sum of boxes 1 and 2.

For Form 5498-SA,

Box 5 is to be completed with the TOTAL from box 1 (annual HSA contributions). Note, there is no requirement to include rollovers or the fair market value.

For Form 5498 ESA.

Box 5 is to be completed with the TOTAL (i.e. SUM) of the amounts from boxes 1 (traditional IRA contributions, and 2 (rollovers and transfers).

It is unclear why the IRS takes an inconsistent approach with respect to these three forms. It is important to understand the IRS does.

For the 1099 Forms,

Form W-2G

completing box 5 on Form 1096 is very simple for Forms 1099-R, 1099-SA and Form 1099-Q. Insert the total of the amounts in box 1 for the total number of the same forms filed. No other amounts are to be included. The 2009 IRS Instructions for Box 5 are set forth below:

Box 5. No entry is required if you are filing Forms 1099-A or 1099-G. For all other forms, enter the total of the amounts from the specific boxes of the forms listed below.

Box 1

Form 1098	Boxes 1, 2, and 4
Form 1098-C	Box 4c
Form 1098-E	Box 1
Form 1098-T	Boxes 1, 2, 4, 5, 6, and 10
Form 1099-B	Boxes 2 and 3
Form 1099-C	Box 2
Form 1099-CAP	Box 2
Form 1099-DIV	Boxes Ia, 2a, 3, 8, and 9
Form 1099-H	Box 1
Form 1099-INT	Boxes 1, 3. and 8
Form 1099-LTC	Boxes 1 and 2
Form 1099-MISC	Boxes 1, 2, 3, 5, 6, 7, 8, 10, 13,
	and 14
Form 1099-01D	Boxes 1, 2, and 6
Form 1099-PATR	Boxes 1, 2, 3, and 5
Form 1099-Q	Box 1
Form 1099-R	Box 1
Form 1099-S	Box 2
Form 1099-SA	Box 1
Form 3921	Boxes 3 and 4
Form 3922	Boxes 3, 4, and 5
Form 5498	Boxes 1, 2, 3, 4. 5, 8, 9, 10,
	12b, 13a, 14a, and 15a
Form 5498-ESA	Boxes 1 and 2
Form 5498-SA	Box 1

Continued on page 8



Boxes on Form 1096, Continued from page7

Boxes Below Boxes 1 to 5.

Form 1096 is used as the transmittal (summary) form for 29 informational forms. Again, a separate Form 1096 must used for each type of information form. One Form 1096 must be prepared for each type of information form being filed. An "x" is to be entered into only one of the boxes (i.e. the applicable box). For example, if the Filer is sending in 35 5498 forms for 2008, it would check the 5498 box and insert 35 in box 3.

If the Filer knows that it will not be required to file <u>any</u> of the Forms 1099, 1098, 5498 or W-2G in the future, either on paper or electronically, enter an "x" in the "final return" box. A Filer is not to complete this form just because it no longer will file one specific form (e.g. it no longer has any Coverdell ESAs to service and it has a policy of no longer opening new CESA accounts).

Where To File.

The 2009 instructions shows only two filing sites for the submission of paper forms whereas the 2008 instructions listed 5 such sites. We have checked with the IRS and a financial institution is to send their paper forms to either Austin, TX or Kansas City, MO.

If your principal business, office or agency, or legal residence in the case of an individual, is located in

Use the following three-line address

Alabama, Arizona, Arkansas, Connecticut, Delaware, Florida, Georgia, Kentucky, Louisiana, Maine, Massachusetts, Mississippi, New Hampshire, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, Texas, Vermont, Virginia, West Virginia

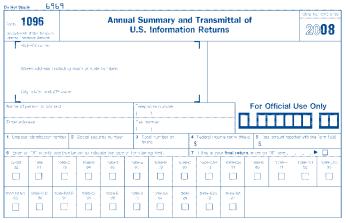
Department of the Treasury Internal Revenue Service Center Austin, TX 73301

Alaska, California, Colorado, District of Columbia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kansas, Maryland, Michigan, Minnesota, Missouri, Montana, Nebraska, Nevada, North Dakota, Oklahoma, Oregon, South Carolina, South Dakota, Tennessee, Utah, Washington, Wisconsin, Wyoming

Department of the Treasury Internal Revenue Service Center Kansas City, MO 64999

Summary

IRA/HSA/CESA personnel want to understand how, why and when to complete Form 1096. There will be times when your financial institution will need to correct an information return with respect to an IRA, HSA or CESA. Hopefully, this article will assist you. You should always check to see if the IRS has issued later guidance. This article discusses IRS guidance as of August 31, 2009. ◆



Return this entire page to the Internal Revenue Service. Photocopies are not acceptable.

Under penalties of perury, I declare that I have examined this return and accompanying documents, and, to the best of my knowledge and belief, they are true correct, and complete.

Form 1096 Annu Department Allia Thawasia (Marca (Marca (Marca) Marca)					al Summary and Transmittal of U.S. Information Returns							2009		
FILE	R'S name						7				'			
Street	et address (including	room or suite n	umber)											
City.	state, and ZIP code													
Name of person to contact Email address				Teleph	one number				For Official Use Only					
				Fax nu) Imber		— ш				ШП			
Email addre	185			()									
1 Employer	identification number		•	3 Tot) al number o ns			me tax withhe	S		orted with this	Form 109		
Employer	icentification number :: "X" in only one box I	pelow to indicat	e the type o	3 Tot form) al number of ns ng filed.	7	If this is you	r final retur	S n, enter an	'X" here .	<u>,</u> ▶			
l Employer	identification number		•	3 Tot) al number o ns				S					
Employer Enter an	"X" in only one box	elew to indicat	e the type o	3 Tot form bein) all number of ms ng filed.	7 1099-0	If this is you	r final retur	S n, enter an	X" here .	1296-001	107#1		
Employer Enter an	"X" in only one box	relow to indicat	e the type o	3 Tot form bein) all number of ms ng filed.	7 1099-0	If this is you	r final retur	S n, enter an	X" here .	1296-001	107#1		

Return this entire page to the Internal Revenue Service. Photocopies are not acceptable.

Under penalties of perjary, I declare that I have examined this return and accompanying documents, and, to the best of my knowledge and belief, they are true, correct, and complete.

Signature ► Title ► Date ►