

MEMO# 5973

June 17, 1994

1994 UPDATE OF INSTITUTE SURVEY RELATING TO PASSIVE FOREIGN INVESTMENT COMPANIES (PFICS)

June 17, 1994 TO: ACCOUNTING/TREASURERS MEMBERS NO. 16-94 CLOSED-END FUND MEMBERS NO. 17-94 INTERNATIONAL COMMITTEE NO. 11-94 MEMBERS - ONE PER COMPLEX NO. 39-94 TAX MEMBERS NO. 26-94 RE: 1994 UPDATE OF INSTITUTE SURVEY RELATING TO PASSIVE FOREIGN INVESTMENT COMPANIES ("PFICS")

Attached is the Institute's 1994 listing of potential passive foreign investment companies ("PFICs"). Potential PFICs are broken down into three categories: (1) entities which have been determined to be PFICs, (2) entities which are potentially PFICs, but whose status is unclear, and (3) entities which were suspected of being, but were determined not to be, PFICs. With respect to each category of PFIC, the listing includes the name of the entity and, if known, the entity's country of operation. The Institute has compiled this list based solely on information received from its members. The Institute has not independently verified any of the information in this memorandum, and the information should not be relied upon without further investigation by fund auditors or counsel. Questions regarding items contained in the survey should be directed to Betsy Teter at (202) 326-5838. Questions regarding the federal income tax treatment of PFICs should be directed to Keith Lawson at (202) 326-5832 or Peter Cinquegrani at (202) 326- 5837. Elizabeth A. Teter Legislative Assistant Attachment