Foreign-owned U.S. DE

Form **1120**
Department of the Treasury
Internal Revenue Service

U.S. Corporation Income Tax Return

For calendar year 2025 or tax year beginning _____, 2025, ending _____, 20 ____
Go to *www.irs.gov/Form1120* for instructions and the latest information.

OMB No. 1545-0123
2025

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 ☐

Name	B Employer identification number
Silva Trading LLC	00-1234567
Number and street. If a P.O. box, see instructions. / Room or suite no.	C Date incorporated
1234 Example Street, Suite 100	
City or town / State or province / Country / ZIP or foreign postal code	D Total assets (see instructions)
Cheyenne / WY / / 82001	$

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

Income	1a	Gross receipts or sales	1a	
	b	Returns and allowances	1b	
	c	Balance. Subtract line 1b from line 1a		1c
	2	Cost of goods sold (attach Form 1125-A)		2
	3	Gross profit. Subtract line 2 from line 1c		3
	4	Dividends and inclusions (Schedule C, line 23)		4
	5	Interest		5
	6	Gross rents		6
	7	Gross royalties		7
	8	Capital gain net income (attach Schedule D (Form 1120))		8
	9	Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797)		9
	10	Other income (see instructions—attach statement)		10
	11	**Total income.** Add lines 3 through 10		11
Deductions (See instructions for limitations on deductions.)	12	Compensation of officers (see instructions—attach Form 1125-E)		12
	13	Salaries and wages (less employment credits)		13
	14	Repairs and maintenance		14
	15	Bad debts		15
	16	Rents		16
	17	Taxes and licenses		17
	18	Interest (see instructions)		18
	19	Charitable contributions		19
	20	Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562)		20
	21	Depletion		21
	22	Advertising		22
	23	Pension, profit-sharing, etc., plans		23
	24	Employee benefit programs		24
	25	Energy efficient commercial buildings deduction (attach Form 7205)		25
	26	Other deductions (attach statement)		26
	27	**Total deductions.** Add lines 12 through 26		27
	28	Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11		28
	29a	Net operating loss deduction (see instructions)	29a	
	b	Special deductions (Schedule C, line 24)	29b	
	c	Add lines 29a and 29b		29c
Tax, Refundable Credits, and Payments	30	**Taxable income.** Subtract line 29c from line 28. See instructions		30
	31	Total tax (Schedule J, line 12)		31
	32	First installment of section 1062 applicable net tax liability. Enter amount from Form 1062, line 15		32
	33	Total payments, credits, and section 1062 applicable net tax liability (Schedule J, line 23)		33
	34	Estimated tax penalty. See instructions. Check if Form 2220 is attached ☐		34
	35	**Amount owed.** If line 33 is smaller than the total of lines 31, 32, and 34, enter amount owed		35
	36	**Overpayment.** If line 33 is larger than the total of lines 31, 32, and 34, enter amount overpaid		36
	37	Enter amount from line 36 you want: **a Credited to 2026 estimated tax** _____ **b Refunded**		37b
		c Routing number _____ **d** Type: ☐ Checking ☐ Savings		
		e Account number _____		

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Sign Here

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. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

(sample - not signed)		Member
Signature of officer	Date	Title

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

Paid Preparer Use Only

Preparer's name	Preparer's signature	Date	Check ☐ if self-employed	PTIN
Firm's name			Firm's EIN	
Firm's address			Phone no.	

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Form **5472**
(Rev. December 2023)

Department of the Treasury
Internal Revenue Service

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.

For tax year of the reporting corporation beginning January 1, 2025, and ending December 31, 2025

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

OMB No. 1545-0123

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

1a Name of reporting corporation Silva Trading LLC	**1b Employer identification number** 00-1234567
Number, street, and room or suite no. (If a P.O. box, see instructions.) 1234 Example Street, Suite 100	**1c** Total assets $ 10,000
City or town, state, and ZIP code (If a foreign address, see instructions.) Cheyenne, WY 82001	

1d Principal business activity: Online retail - gifts and novelty goods		**1e** Principal business activity code: 459420
1f Total value of gross payments made or received reported on **this** Form 5472. See instructions. $ 10,000	**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. See instructions. $ 10,000

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 . . . . ☑	**1k** Total number of Parts VIII attached to Form 5472 0	**1l** Country of incorporation United States
1m Date of incorporation 03/03/2025	**1n** Country(ies) under whose laws the reporting corporation files an income tax return as a resident United States	**1o** Principal country(ies) where business is conducted United States	

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 . ☑

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. See instructions . . . . . ☑

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
Maria Silva, Rua Exemplo 100, Sao Paulo, SP 01000-000, Brazil

4b(1) U.S. identifying number, if any	**4b(2)** Reference ID number (see instructions) SILVA001	**4b(3)** Foreign taxpayer identification number (FTIN), if any (see instructions) 000.000.000-00

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

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

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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 ☑ foreign person or ☐ U.S. person?

8a Name and address of related party

Maria Silva, Rua Exemplo 100, Sao Paulo, SP 01000-000, Brazil

8b(1) U.S. identifying number, if any	**8b(2)** Reference ID number (see instructions)	**8b(3)** FTIN, if any (see instructions)
	SILVA001	000.000.000-00

8c Principal business activity: Individual - sole member of the LLC **8d** Principal business activity code

8e Relationship—Check boxes that apply: ☐ Related to reporting corporation ☐ Related to 25% foreign shareholder ☑ 25% foreign shareholder

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

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. ☐

9	Sales of stock in trade (inventory)	9	
10	Sales of tangible property other than stock in trade	10	
11	Platform contribution transaction payments received	11	
12	Cost sharing transaction payments received	12	
13a	Rents received (for other than intangible property rights)	13a	
b	Royalties received (for other than intangible property rights)	13b	
14	Sales, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	14	
15	Consideration received for technical, managerial, engineering, construction, scientific, or like services	15	
16	Commissions received	16	
17	Amounts borrowed (see instructions) **a** Beginning balance _____ **b** Ending balance or monthly average	17b	
18	Interest received	18	
19	Premiums received for insurance or reinsurance	19	
20	Loan guarantee fees received	20	
21	Other amounts received (see instructions)	21	
22	**Total.** Combine amounts on lines 9 through 21	22	0
23	Purchases of stock in trade (inventory)	23	
24	Purchases of tangible property other than stock in trade	24	
25	Platform contribution transaction payments paid	25	
26	Cost sharing transaction payments paid	26	
27a	Rents paid (for other than intangible property rights)	27a	
b	Royalties paid (for other than intangible property rights)	27b	
28	Purchases, leases, licenses, etc., of intangible property rights (for example, patents, trademarks, secret formulas)	28	
29	Consideration paid for technical, managerial, engineering, construction, scientific, or like services	29	
30	Commissions paid	30	
31	Amounts loaned (see instructions) **a** Beginning balance _____ **b** Ending balance or monthly average	31b	
32	Interest paid	32	
33	Premiums paid for insurance or reinsurance	33	
34	Loan guarantee fees paid	34	
35	Other amounts paid (see instructions)	35	
36	**Total.** Combine amounts on lines 23 through 35	36	0

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. ☐

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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?	☐ Yes	☑ No
38a	If "Yes," is the basis or inventory cost of the goods valued at greater than the customs value of the imported goods?	☐ Yes	☐ No
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?	☐ Yes	☐ No
39	During the tax year, was the foreign parent corporation a participant in any cost sharing arrangement (CSA)? If "Yes," complete Part VIII as instructed below.	☐ Yes	☑ No
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? See instructions	☐ Yes	☑ No
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 related party? If "Yes," complete lines 41b, 41c, and 41d. See instructions	☐ Yes	☑ No
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). See instructions $		
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. See instructions $		
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. See instructions $		
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)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest within the relevant safe-haven range (100% to 130% of the applicable Federal rate (AFR) for the relevant term)?	☐ Yes	☑ No
b	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)(2)(iii)(B) are applicable, and for which the reporting corporation used a rate of interest outside the relevant safe-haven range (100% to 130% of the AFR for the relevant term)?	☐ Yes	☑ No
43a	Did the reporting corporation issue a covered debt instrument in any of the transactions described in Regulations section 1.385-3(b)(2) during the tax year with respect to a related party that is a corporation, or, did the reporting corporation issue or refinance indebtedness owed to a related party that is a 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 reporting corporation, and either the issuance or refinance of indebtedness, or the distribution or acquisition, occurred during the tax year?	☐ Yes	☐ No
b	If the answer to question 43a 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 $		

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.		
45	During the course of the tax year, did the reporting corporation become a participant in the CSA?	☐ Yes	☐ No
46	Was the CSA in effect before January 5, 2009?	☐ Yes	☐ No
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 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?	☐ Yes	☐ No
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 ☐	

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Statement attached to Form 5472 (Rev. December 2023) - Part V

Reporting corporation: Silva Trading LLC EIN: 00-1234567
Tax year: January 1, 2025 - December 31, 2025
Related party: Maria Silva (Brazil), direct 25% foreign shareholder, reference ID SILVA001

Part V - Reportable transactions of a reporting corporation that is a foreign-owned U.S. DE

Transactions described in Regulations section 1.482-1(i)(7) that are not entered in Part IV:

1. Contribution to capital, in cash, received from Maria Silva (sole member) on March 17, 2025, in connection with the formation and funding of the entity:	**US$10,000**
2. Distributions from the entity to the member during the tax year:	**None**
Total reported on Form 5472, line 1f:	**US$10,000**

All amounts are stated in U.S. dollars. No amount was converted from a foreign currency.

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