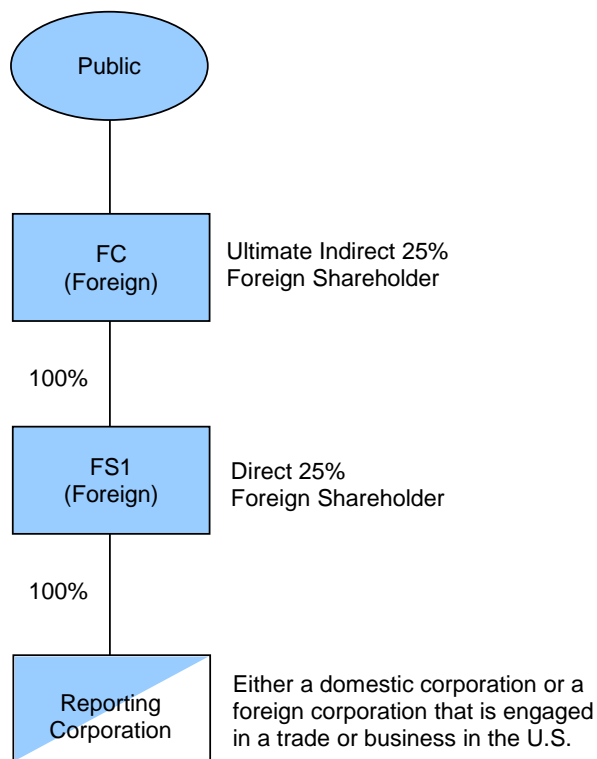


**Form 5472: Public Foreign Corp. As  
Ultimate Indirect 25% Foreign Shareholder**



FC, a large foreign multinational corporation that is publicly owned, wholly owns FS1, a foreign corporation, which in turn wholly owns RC, a reporting corporation. FS1 is the direct 25-percent foreign shareholder. FC is the indirect 25-percent foreign shareholder. FC is also the ultimate 25-percent foreign shareholder because if the stock of RC is attributed proportionately to the shareholders of FC, no one person is considered to own 25 percent of RC. Accordingly, Part II of Form 5472 should be completed with FC as the ultimate indirect 25-percent foreign shareholder and with FS1 as the direct 25-percent foreign shareholder.