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Acting Secretary of the Treasury

August 8, 2012

ADMINISTRATIVE DETERMINATION NO. 12-12

ATTENTION: NONRESIDENT FOREIGN CORPORATIONS AND PARTNERSHIPS SUBJECT TO THE INCOME SOURCE RULE UNDER SECTION 1035.05 OF THE PUERTO RICO INTERNAL REVENUE CODE OF 2011

SUBJECT: INCOME TAX RETURN FILING REQUIREMENT

I. STATEMENT OF MOTIVES

On March 31, 2011, the Department of the Treasury (Department) issued Internal Revenue Informative Bulletin No. 11-08 (Bulletin 11-08) answering questions related to the application of the effectively connected income source rule introduced by Act 154-2010, as amended (the "ECISR")¹.

Among other things, Bulletin 11-08 indicates that corporations subject to the ECISR must use Form 480.20 (*Corporation Income Tax Return*) to report income under the ECISR².

The Puerto Rico Internal Revenue Code of 2011, as amended (the "2011 Code"), changed significantly the Puerto Rico tax treatment of partnerships and limited liability companies (LLCs) that are treated as partnerships or disregarded entities for purposes of the U.S. Internal Revenue Code (the "US IRC") or applicable foreign tax statutes. Whereas under the 1994 Code, partnerships and LLCs were, with certain exceptions,

¹ Act 154-2010, as amended, introduced changes to the effectively connected income source rules under Section 1123(f) of the Puerto Rico Internal Revenue Code of 1994, as amended (1994 Code). As a result of such changes, new rules were established for purposes of determining the income, gain or loss of a nonresident individual or a foreign corporation or partnership that shall be treated as income effectively connected with a trade or business in Puerto Rico. According to Section 1035.05 of the 2011 Code, the provisions of Section 1123(f) of the 1994 Code shall remain in effect after the approval of the 2011 Code.

² Please refer to Question 1 on page 2 of Bulletin 11-08.

treated as taxable entities separate from their partners or members, under the 2011 Code, partnerships and LLCs that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes are treated as flow through entities under rules similar to the partnership rules in Subchapter K of the US IRC.

Consequently, taxpayers have requested guidance as to the filing and reporting requirements applicable to partnerships and LLCs that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes, and to their partners or members, with respect to any Puerto Rico income tax liability arising under the ECISR. Such requests for guidance generally relate to situations where the entity that is deemed engaged in trade or business in Puerto Rico pursuant to Section 1123(f)(4)(B)(ii) of the 1994 Code (applicable under the 2011 Code by virtue of Section 1035.05 of the 2011 Code) has more than one partner or member which, in turn, is deemed engaged in trade or business within Puerto Rico by virtue of Section 1071.01 of the 2011 Code, or where there is a chain of flow-through entities between such entity and any ultimate owner that is not a flow-through entity. Similar requests for guidance by entities engaged in trade or business in Puerto Rico without regard to Section 1123(f)(4)(B)(ii) of the 1994 Code were addressed in Administrative Determination 12-07, issued by this Department on March 14, 2012.

The purpose of this Administrative Determination is, first, to notify that, in the case of foreign corporations subject to the ECISR that, except for the application of Section 1123(f)(4)(B)(ii) of the 1994 Code, would not otherwise be deemed engaged in trade or business in Puerto Rico, a new form is available to report income under the ECISR, Form 480.20(U). Furthermore, this Administrative Determination provides guidance to partnerships and LLCs that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes, and their partners or members, with respect to their filing and reporting requirements for any Puerto Rico income tax liability arising under the ECISR, and allows the filing of composite returns under the circumstances described herein.

II. STATUTORY BASIS

Pursuant to Section 1010.01(a)(3)(A) of the 2011 Code, an LLC that is treated as a partnership or disregarded entity for purposes of the US IRC or applicable foreign tax statutes is treated as a partnership for Puerto Rico income tax purposes. Accordingly, all references in this Administrative Determination to "partnerships" and "partners" apply equally to LLCs that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes, and their members.

A. Foreign Partners

Section 1071.01 of the 2011 Code provides that partners in a partnership that is engaged in trade or business in Puerto Rico are deemed engaged in trade or business in Puerto Rico with respect to their distributive share in the partnership's income, gains,

losses, deductions or credits. Accordingly, foreign corporations and nonresident individual partners are subject to the regular income tax rates in Subchapters A and B of Chapter 2 of Subtitle A of the 2011 Code with respect to the income treated as effectively connected with the active conduct of a trade or business in Puerto Rico.

Pursuant to Sections 1091.07(b) and 1092.06(b), the Secretary may, subject to such conditions, limitations and exceptions as he may establish, exempt from the requirement to file an income tax return nonresident aliens and foreign corporations that are deemed engaged in trade or business in Puerto Rico solely by reason of Section 1071.01, if their Puerto Rico income tax liability is satisfied through the withholding of income taxes at the source.

B. Partnerships

Section 1061.03 requires that every partnership file a return to report, among others, the income and deductions of the partnership, as well as the name, address and taxpayer identification number ("TIN") of the partners that will participate in the partnership's income and losses for such taxable year. The partnership must also provide to each partner a report with such information as may be necessary for the partners to meet their Puerto Rico income tax responsibilities under the 2011 Code.

Pursuant to Section 1062.07, the partnership is also required to withhold and deposit with the Secretary, on a quarterly basis, 30% (or applicable lower rate) of the estimated amount of each partner's distributive share of the partnership's income or gains. Any unpaid balance at the close of the taxable year must be deposited together with the return required by Section 1061.03(a) or a request for automatic extension of time to file such return.



III DETERMINATIONS

A. Individuals and Foreign Corporations

As previously mentioned, foreign corporations subject to the ECISR that, except for the application of Section 1123(f)(4)(B)(ii) of the 1994 Code, would not otherwise be deemed engaged in trade or business in Puerto Rico, must report their income under the ECISR in Form 480.20(U), available in our Internet Page, www.hacienda.gobierno.pr, under "Returns of Taxable Corporations", and compute the tax thereon in Part I of said Form.

In addition, and as indicated in Question 5 of Bulletin 11-08, all corporations subject to the ECISR must comply with the estimated tax payments requirements of Section 1061.23 of the 2011 Code. The estimated tax payments under the ECISR are to be made together with Form 480.37, or using "Colecturia Virtual" at www.hacienda.gobierno.pr.

Finally, taxpayers that, even in the absence of Section 1123(f)(4)(B)(ii) of the 1994 Code, would be subject to taxation in PR and are also subject to the ECISR³ must complete and include Schedule U (Net Income Attributable to Puerto Rico Sources pursuant to Section 1123(f) of the Code) with their corresponding income tax return. Schedule U is available in our Internet Page under "Schedules".

B. Partnerships and Their Partners

1. General Rule

Partnerships (including LLCs that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes) that are subject to the ECISR and which, except for the application of Section 1123(f)(4)(B)(ii) of the 1994 Code, would not be otherwise deemed engaged in trade or business in Puerto Rico (referred to herein as "Act 154 Resident Partnerships), must report their income under the ECISR in Form 480.20(U). The Act 154 Resident Partnership does not need to complete Part I of Form 480.20(U), but must report its partners' distributive share of such income, and the Puerto Rico income tax deposited with respect thereto, in Part II of the Form. Form 480.20(U) must be filed with the Secretary on or before the **15th day of the sixth month** following the close of the partnership's taxable year, or extended due date.

Every partnership that is required to file Form 480.20(U) must also complete and remit to each of its partners the informative return (Form 480.6 S (Spanish) or 480.60 S (English)), required under Section 1061.03(b) of the 2011 Code. The informative return must be provided to each such partner on or before the **15th day of the sixth month** following the close of the partnership's taxable year, or extended due date.

In addition, all partnerships subject to the ECISR (Act 154 Resident Partnerships as well as partnerships that, even in the absence of Section 1123(f)(4)(B)(ii) of the 1994 Code, would be treated as engaged in trade or business in Puerto Rico) must comply with the estimated tax payments requirements of Section 1062.07(b) of the 2011 Code. The estimated tax payments with respect to the income under the ECISR are to be made together with Form 480.37, or using "Colecturía Virtual" at www.hacienda.gobierno.pr.

2. Composite Returns

Certain jurisdictions whose tax treatment of pass-through entities and their owners is similar to that under the 2011 Code allow that nonresident owners meet their filing and reporting requirements through the filing of composite returns, generally filed by the entity on its owners' behalf. This mechanism reduces the number of substantially identical returns that the jurisdiction must process, while also reducing compliance costs to those who invest within the jurisdiction through such entities. Hence, as stated in AD

³ That is, the taxpayers referred to in Question 10 of Bulletin 11-08.

12-07, this Department has determined to allow the filing of composite returns in the case of Act 154 Resident Partnerships, subject to the following terms and conditions:

a. Composite returns under this Administrative Determination are only available to partners of partnerships, and LLCs (1) that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes, (2) that are subject to the ECISR and (3) which, except for the application of Section 1123(f)(4)(B)(ii) of the 1994 Code, would not be otherwise deemed engaged in trade or business in Puerto Rico (that is, Act 154 Resident Partnerships).

b. Both corporate and individual partners may opt to participate in the composite return. The election must be made on an annual basis, by submitting to the Act 154 Resident Partnership a sworn statement, in Schedule I (CU), stating, among other things:

i. The partner's name, address, TIN and other information therein requested;

ii. That the partner is a partner or member in the Act 154 Resident Partnership;

iii. That the partner was not a resident of Puerto Rico and, except for the application of Section 1123(f)(4)(B)(ii) of the 1994 Code, would not otherwise be deemed to be engaged, in trade or business within Puerto Rico at any time during the taxable year for which the election to file a composite return is made;

iv. The partner's share in the Act 154 Resident Partnership's income, gains and losses;

v. That the partner does not derive other income from Puerto Rico sources and that the Act 154 Resident Partnership is the partner's sole source of income subject to Puerto Rico income taxation; and

vi. That the partner agrees to be included in the composite return and, if the return reflects an overpayment of tax, that any refund resulting therefrom shall be reimbursed directly to the Act 154 Resident Partnership.

c. All qualifying partners agree to single composite filing: – If the following requirements are met: (1) the Act 154 Resident Partnership has deposited with the Secretary, in accordance with Section 1062.07, an amount at least equal to the net taxable income computed under the ECISR determined by the Act 154 Resident Partnership multiplied by 30%, and (2) all the partners qualify therefor and agree thereto by marking the appropriate box in question 8 of Schedule I (CU), the Act 154 Resident Partnership may file with the Secretary, on or before the 15th day of the sixth month following the close of the Act 154 Resident Partnership's taxable year (or extended due

date, if an extension request was filed by the Act 154 Resident Partnership on behalf of its partners), its Form 480.20-U, and mark the box "All Partners Return".

i. The Act 154 Resident Partnership shall complete Parts II through IX of such return, but not Part I.

ii. The tax liability of the partners shall be the net taxable income under the ECISR determined by the Act 154 Resident Partnership multiplied by 30%.

iii. The Act 154 Resident Partnership must include with the return the original signed copies of the Schedule I (CU) submitted by its partners.

iv. The return filed by the Act 154 Resident Partnership, together with the sworn statement submitted by each partner in Schedule I(CU), shall constitute, for all purposes of the Code, the partnership's and each partner's Puerto Rico income tax return.

d. If not all partners agree to or qualify for a single composite filing:

i. *Individual Partners* - In the case of individual partners (be they U.S. citizens or not), the Act 154 Resident Partnership shall file with the Secretary, on or before June 15 of the year following the close of the partnership's taxable year (or extended due date, if an extension request was filed), a Composite Return - Individual Partners and Members of Partnerships and Limited Liability Companies, Form 482(C) (Spanish) or 482.0(C) (English), available in our Internet Page, www.hacienda.gobierno.pr., under "Returns of Flow-Through Entities". The Act 154 Resident Partnership shall include in Part II, line 1 and Part V, lines 1(G) and 13 of such return the portion of the income computed under the ECISR reported in the partnership's Form 480.20(U) that is attributable to all the individual partners who have opted to be included in the composite return.

(1) The Act 154 Resident Partnership can claim, on behalf of its partners, the personal exemptions (including exemption for dependents) available to partners who are U.S. citizens as reported to the partnership in Schedule I (CU). The Act 154 Resident Partnership cannot claim personal exemptions with respect to partners who are not U.S. citizens, pursuant to Section 1091.04.

(2) The tax liability of the individual partners included in the composite return shall be determined in the aggregate. Inasmuch as, pursuant to Section 1021.01(a), the first bracket of net income is not subject to tax (because the tax rate is 0%), to determine the aggregate income tax liability of said partners, the Act 154 Resident Partnership shall

deduct from the combined net income of the individual partners included in the composite return the amount resulting from multiplying the number of individual partners included in the composite return by the amount of said bracket. Any excess shall be taxed at the maximum tax rate provided in Section 1021.01(a) of the 2011 Code for the taxable year⁴.

(3) The Act 154 Resident Partnership must include with the composite return the original signed copies of the Schedule I (CU) submitted by its partners.

(4) The composite return filed by the Act 154 Resident Partnership, together with the sworn statement submitted by each partner in Schedule I (CU), shall constitute, for all purposes of the Code, the partners' Puerto Rico income tax return.

ii. *Corporate partners* - In the case of corporate partners, the Act 154 Resident Partnership shall file with the Secretary, on or before June 15 of the year following the close of the partnership's taxable year (or extended due date, if an extension request was filed) a Form 480.20-U, marked "Composite Corporation Return". The Act 154 Resident Partnership shall include in Part I, line 1 of such return the portion of the income computed under the ECISR reported in the partnership's Form 480.20(U) that is attributable to all the corporate partners that have opted to be included in the composite return.

(1) The Act 154 Resident Partnership can claim, on behalf of its corporate partners, any portion of surtax deduction allocated to such corporate partners pursuant to Section 1022.02(e) of the 2011 Code.

(2) The tax liability of the corporate partners included in the composite return shall be determined in the aggregate.

(3) The Act 154 Resident Partnership must include with the composite return the original signed copies of the Schedule I (CU) submitted by its partners.

(4) The composite return filed by the Act 154 Resident Partnership, together with the sworn statement submitted by each partner

⁴ For taxable years beginning between January 1, 2011 and December 31, 2011, the first tax bracket, subject to a tax rate of 0%, is 0 to \$5,000. Accordingly, to determine the aggregate tax liability of individual partners included in a composite return for calendar year 2011, the amount to be deducted from the combined net income of the individual partners included in the composite return shall be \$5,000 multiplied by the number of individual partners included in the composite return. Any excess shall be taxed at 33%, that is, the maximum marginal tax rate for taxable years beginning between January 1, 2011 and December 31, 2015.

in Schedule I (CU), shall constitute, for all purposes of the Code, the partners' Puerto Rico income tax return.

e. Partners that elect not to be included in a composite return or that are precluded from doing so because they derive other Puerto Rico source income or because even in the absence of Section 1123(f)(4)(B)(ii) of the 1994 Code, they would be treated as engaged in trade or business in Puerto Rico under the 2011 Code or, in the case of individuals, have resided in Puerto Rico at any time during the taxable year concerned, must file a separate Puerto Rico income tax return under the Code.

3. Chain Ownership

In the context of entities that are subject to the ECISR, a chain of such pass-through entities often separates the purchaser of goods manufactured in Puerto Rico from the ultimate corporate parent company. Accordingly, this Department has determined to allow the filing of composite Partnership Informative Income Tax Returns (Form 480.1(SC) (Spanish) or 480.10(SC) (English)) by partnerships (including LLCs that are treated as partnerships or disregarded entities for purposes of the US IRC or applicable foreign tax statutes) that are subject to the ECISR and which, except for the application of Section 1071.01, would not be otherwise deemed engaged in trade or business in Puerto Rico, under the following terms and conditions:

a. Each of the **intermediate** pass-through entities shall submit to the Act 154 Resident Partnership a sworn statement, in Schedule I (SC), stating, among others:

i. That it is a partner or member of the pass-through entity immediately below it in the chain,

ii. Its share in the income, gains and losses of the pass-through entity immediately below it in the chain; and

iii. That it does not derive any other Puerto Rico source income and has no source of income taxable in Puerto Rico other than from the pass-through entity immediately below it in the chain.

b. On or before the 15th day of the sixth month following the close of the taxable year of the Act 154 Resident Partnership, or extended due date, the Act 154 Resident Partnership shall file:

i. Form 480.20(U) to report its income computed under the ECISR, as well as its partners' distributive share of such income and the Puerto Rico income tax deposited with respect thereto. The Act 154 Resident Partnership must also file the Informative Returns – Partnerships (Form 480.6 S (Spanish) or 480.60 S (English)) reporting the name, address and TIN of its direct partners and their share in the income, gains and losses of the Act 154 Resident Partnership; and

ii. A Composite Informative Income Tax Return (Form 480.1(SC) or 480.10(SC), hereinafter, the "Composite Informative Return"), to report the share of the intermediate pass-through entities in the income, gains and losses of the Act 154 Resident Partnership. The Composite Informative Return must include:

(1) A detailed description of the ownership structure that sets forth the intermediate pass-through entities and their owners, up to the ultimate owners that are not themselves pass-through entities;

(2) The original sworn statements (Schedule I (SC)) submitted by the intermediate pass-through entities; and

(3) The Informative Returns – Partnerships (Form 480.6 S (Spanish) or 480.60 S (English)) reporting the name, address and TIN of any partners of the intermediate pass-through entities that are not themselves pass-through entities, and their share in the income, gains and losses of the Act 154 Resident Partnership.

c. Partners of the intermediate pass-through entities **that are not themselves pass-through entities** must file Puerto Rico income tax returns pursuant to the Code. If two or more of said partners are nonresident individual or foreign corporations that, except for the application of Section 1071.01 of the 2011 Code and Section 1123(f)(4)(B)(ii) of the 1994 Code, are not nor would otherwise be deemed engaged in trade or business in Puerto Rico, they may avail themselves of the composite return mechanisms described in 2. above.

d. As an alternative to the filings described in 2.d. and 3.b. above, if **each and every one of the direct and indirect** partners of the Act 154 Resident Partnership that are not themselves pass-through entities meet the criteria to file composite returns pursuant to 2. above, and provided (1) the Act 154 Resident Partnership has deposited with the Secretary, in accordance with Section 1062.07, an amount at least equal to the net taxable income under the ECISR determined by the Act 154 Resident Partnership multiplied by 30%, and (2) all the partners agree thereto by marking the appropriate box in question 8 of Schedule I (CU), the Act 154 Resident Partnership may file with the Secretary, on or before the 15th day of the sixth month following the close of the partnership's taxable year (or extended due date, if an extension request was filed), its Form 480.20-U, and mark the box "All Partners Return", as described in subparagraph 2.c. above.

i. The Act 154 Resident Partnership shall complete Parts II through IX of such return, but not Part I.

ii. The tax liability of the partners under this alternative shall be the net taxable income computed under the ECISR determined by the Act 154 Resident Partnership multiplied by 30%.


iii. The Act 154 Resident Partnership must include with the return:

(1) A detailed description of the ownership structure that sets forth the intermediate pass-through entities and their owners, up to the ultimate owners that are not themselves pass-through entities;

(2) The original signed copies of the Schedule I (SC) submitted by the intermediate pass-through entities; and

(3) The original signed copies of the Schedule I (CU) submitted by all direct and indirect partners that are not themselves pass-through entities.

iv. The return filed by the Act 154 Resident Partnership, together with the sworn statements submitted by the intermediate pass-through entities in Schedule I (SC) and the sworn statement submitted by each partner in Schedule I (CU), shall constitute, for all purposes of the Code, the Act 154 Resident Partnership's, as well as each intermediate pass-through entity's and each partner's Puerto Rico income tax return.

 4. *Extension of time to file returns-*

a. The Act 154 Resident Partnership may, for itself or on behalf of its partners, on or before the applicable due date, request a three-month extension of time to file the applicable returns, as follows:

i. For itself:

(1) Extension of time to file Form 480.20(U) to report its income under the ECISR – on or before the 15th day of the sixth month following the close of the partnership's taxable year, file Form SC 2644, and mark line 16, box c., Partnership.

(2) Extension of time to file Form 480.6 S/480.60 S or 480.20(U) (when Form 480.20(U) is used in lieu of the informative return required under Section 1061.03(b) of the 2011 Code, pursuant to 2.c. and 3.d. above) – on or before the 15th day of the sixth month following the close of the partnership's taxable year, file Form SC 2644.1, and mark Part II, box 1.

ii. On behalf of its partners:

(1) On behalf of intermediate pass-through entities in the chain of ownership: Extension of time to file Form 480.6 SC/480.60 SC – on or before the 15th day of the sixth month following the close of the partnership's taxable year, file Form SC 2644.1, and mark Part II, box 2.

(2) On behalf of all partners: Extension of time to file Form 480.20(U) as composite return for "All Partners" pursuant to 2.c. and 3.d. above – on or before the 15th day of the sixth month following the close of the partnership's taxable year, file Form SC 2644, as follows:

(a) On the first line of Part I, the Act 154 Resident Partnership shall include its TIN;

(b) On the second line of Part I – Individual's First Name – the Act 154 Resident Partnership shall write "Non-resident Partners Filing a Composite Return";

(c) The Act 154 Resident Partnership must complete the next lines in Part I with its name, address, telephone numbers and business;

(d) Part II shall be left blank;

(e) The Act 154 Resident Partnership shall fill out Parts III and IV on the basis of its net income computed under the ECISR, as described in 2.c. and 3.d. above;

(f) In Part V, the Act 154 Resident Partnership shall check line 16, box d - "Partnership on behalf of partners"; and

(g) The request for extension of time to file must be sworn and signed by the Act 154 Resident Partnership's managing partner, general manager or authorized representative.

(3) On behalf of individual or corporate partners filing composite returns: Extension of time to file Form 482(C)/480.0(C), Composite Return - Individual Partners and Members of Partnerships and Limited Liability Companies, or Form 480.20(U) as Composite Corporation Return pursuant to 2.d. above – on or before the June 15 of the year following the close of the partnership's taxable year, file Form SC 2644, as follows:

(a) In the case of nonresident individual partners on whose behalf the Partnership will file a Composite Return -



Individual Partners and Members of Partnerships and Limited Liability Companies, Form 482 (C)/480.0(C):

(i) On the first line of Part I, the Act 154 Resident Partnership shall include its TIN;

(ii) On the second line of Part I – Individual's First Name – the Act 154 Resident Partnership shall write "Non-resident Individual Partners Filing a Composite Return";

(iii) The Act 154 Resident Partnership must complete the next lines in Part I with its name, address, telephone numbers and business;

(iv) Part II shall be left blank;

(v) The Act 154 Resident Partnership shall fill out Parts III and IV on the basis of the aggregate income computed under the ECISR that is attributable to the individual partners that will be included in the composite return, as described in 2.d.i. above;

(vi) In Part V, the Act 154 Resident Partnership shall check line 16, box d - "Partnership on behalf of partners"; and

(vii) The request for extension of time to file must be sworn and signed by the Act 154 Resident Partnership's managing partner, general manager or authorized representative.

(b) In the case of foreign corporate partners on whose behalf the Act 154 Resident Partnership will file Form 480.20(U) as Composite Corporation Return pursuant to 2.d. above:

(i) On the first line of Part I, the Act 154 Resident Partnership shall include its TIN;

(ii) On the second line of Part I – Individual's First Name – the Act 154 Resident Partnership shall write "Non-resident Corporate Partners Filing a Composite Return";

(iii) The Act 154 Resident Partnership must complete the next lines in Part I with its name, address, telephone numbers and business;



(iv) Part II shall be left blank;

(v) The Act 154 Resident Partnership shall fill out Parts III and IV on the basis of the aggregate income computed under the ECISR that is attributable to the corporate partners that will be included in the composite return, as described in 2.d.ii. above;

(vi) In Part V, the Act 154 Resident Partnership shall check line 16, box d - "Partnership on behalf of partners"; and

(vii) The request for extension of time to file must be sworn and signed by the Act 154 Resident Partnership's managing partner, general manager or authorized representative.

b. Partners that do not qualify, or that choose not, to file composite returns may request an automatic 3-month extension of time to file their Puerto Rico income tax returns (Forms 480.2/480.20, 482/482.0 or 480.1(S)/480.10(S), as applicable) by filing, on or before the 15th day of the sixth month following the close of the partner's taxable year, Form 2644, and marking the appropriate box in line 16. Individual and corporate partners may request an additional one-month extension by filing, on or before the expiration of the original 3-month extension, Form 2644 and filling out Part VI, line 2.

The provisions of this Administrative Determination apply to tax returns filed on or after the date of this Determination. For additional information regarding this Administrative Determination, you may contact us by email to info154@hacienda.gobierno.pr.

Cordially,



Blanca Álvarez Ramírez
Acting Secretary of the Treasury