



DTF-686-ATT

New York State Department of Taxation and Finance

New York Reportable Transaction Disclosure Statement and Request for a Determination

All filers must enter tax period: beginning [] ending []

Form with fields: Name(s) as shown on return, Spouse's name, Mailing address, City, village, town, or post office, State, ZIP code, Taxpayer's e-mail address, Taxpayer identification number shown on page 1 of your tax return, Spouse's identification number (if applicable)

A Mark an X in the box if a protective disclosure (see instructions, Form DTF-686-ATT-I, for assistance) []

B Mark an X in the box if requesting a determination (see instructions) []

1a Name of New York reportable transaction, 1b Initial year participated in transaction (yyyy)

2 Identify the type of New York reportable transaction. Mark an X in the boxes that apply (see instructions).

- A [] New York listed transaction, B [] New York confidential transaction, C [] New York transaction with contractual protection

3 If the transaction is a listed transaction, or substantially similar to a listed transaction, identify here (see instructions).

4 If you participated in the transaction through another entity, such as a partnership, an S corporation, or a foreign corporation, provide the information below for the entity.

Form with fields: a Name, b Type of entity, c Form number of New York State tax return filed, d Employer identification number (EIN)

5 Enter below the name and address of each person to whom you paid a fee with regard to the transaction if that person promoted, solicited, or recommended your participation in the transaction, or provided tax advice related to the transaction. Attach additional sheets if necessary.

Table with columns: Name, Identifying number (if known), Mailing address (number and street or rural route), Apartment number, Fee paid, City, village, or post office, State, ZIP code



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6 Facts

a Identify the type of tax benefit generated by the transaction. Mark an **X** in the boxes that apply (*see instructions*).

- | | | | |
|--|---|--|--------------------------------------|
| <input type="checkbox"/> Deductions | <input type="checkbox"/> Exclusions from gross income | <input type="checkbox"/> Tax credits | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Capital loss | <input type="checkbox"/> Nonrecognition of gain | <input type="checkbox"/> Deferral | |
| <input type="checkbox"/> Ordinary loss | <input type="checkbox"/> Adjustments to basis | <input type="checkbox"/> Absence of adjustments to basis | |

b Further describe below the amount and nature of the expected tax benefits generated by the transaction for all affected years. Include facts of each step of the transaction that relate to the expected tax benefits including the amount and nature of your investment. Include in your description your participation in the transaction and all related transactions regardless of the year in which they were entered into.

7 Identify all tax exempt, foreign, and related entities and individuals involved in the transaction. Mark an **X** in the appropriate box(es) (*see instructions*). Include their name(s), identifying number(s), address(es), and a brief description of their involvement. For each foreign entity, identify its country of incorporation or existence. For each related entity, explain how it is related. (*Attach additional sheets, if necessary. Include your name and identifying number on all attached sheets.*)

a Type of entity: Tax-exempt Foreign Related

Name	Identifying number
Address	
Description	

b Type of entity: Tax-exempt Foreign Related

Name	Identifying number
Address	
Description	

