

MARKET BULLETIN

From	Manager, Tax Operations Members' Services Unit (extn 2433)
Date	9 March 2007
Reference	Y3977
Subject	Apportionment of US Investment Income to Underwriting Years of Account
Subject areas	RETURNS REQUIRED FOR 2006 US INCOME TAX YEAR
Attachments	
Action points	Provide details for allocation of US Investment Income to Underwriting Years of Account
Deadlines	13 April 2007

1 Background

- 1.1 In order that Lloyd's may prepare for and file the Lloyd's consolidated US tax return, Lloyd's syndicates must provide details to enable US investment income to be allocated to the relevant underwriting year. These are called Riesco percentages.

2 Apportionment of US Dollar Investment Income – Riesco Percentages

- 2.1 A return is required to allocate the investment income of each syndicate for the calendar year 2006 to the respective underwriting years of account open during the year.
- 2.2 The Riesco forms are available electronically on the Lloyd's L-net. The forms can be accessed utilising L-net InfoBase, selecting 'Market Returns' and then selecting, 'Taxation Operations'.

3 Basis of the Return

- 3.1 Details are required for the allocation of US Dollar investment income and capital gains for calendar year 2006 to the underwriting accounts open during the year. One of three bases may be used: -

- a) Wherever possible, a single return should be made based on the combined income from the Lloyd's American Trust Fund (LATF-1993 & post accounts only), the Lloyd's Dollar Trust Funds (LDTF) and the Surplus Lines and Credit for Reinsurance Static Funds – the Consolidated Return.
 - b) Separate returns may be made for LATF and LDTF including Static Funds income.
 - c) As for b) above but with the Static Funds income excluded from the LDTF returns and specific returns made for these Static funds.
- 3.2 The fund or funds to which the return relates should be indicated by selecting the appropriate fund from the dropdown box on the return.
- 3.3 Income from the Joint Assets Trust Funds and Illinois and Kentucky Trust Funds should be ignored in completing the returns.

4 Allocation of Income to Years of Account

- 4.1 Riesco percentages - The percentages of the US Dollar investment income for calendar year 2006, attributable to each year of account open during 2006, should be entered, including any run-off year(s). The sum of all the percentages must equal 100%.
- 4.2 If income from a group account in the LATF is to be allocated to more than one syndicate, the percentage split between syndicates must be provided separately. The total allocated over all syndicates on the account should equal 100% and a Riesco return must be submitted for each syndicate concerned.

5 Return Process Deadlines and Queries

- 5.1 The form must be submitted via L-Net no later than 13 April 2007. Please submit by using the 'send to tax operations' button.
- 5.2 Any queries relating to the electronic form software should be addressed in the first instance to Clare Desmond on extension 2180, or emailed to Lloyds-Tax-Ops@Lloyds.com. Business and general queries should be directed to Ian Chidgey on extension 2393.

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