

Schedule K-3
(Form 1065)

Partner's Share of Income, Deductions,
Credits, etc.—International

OMB No. 1545-0123
2022

Department of the Treasury Internal Revenue Service For calendar year 2022, or tax year beginning 2022, ending See separate instructions.

Information About the Partnership	Information About the Partner
A Partnership's employer identification number (EIN) 99-9999999	C Partner's SSN or Taxpayer Identification Number (TIN) (Do not use TIN of a disregarded entity. See instructions.) APPLIED FOR
B Partnership's name, address, city, state, and ZIP code K-3 ALL PARTS 123 MAIN STREET NEW YORK, NY 11010	D Name, address, city, state, and ZIP code for partner entered in C. See instructions. 173 - PWC ENTITY 173 - NAME LINE 2 173 ROSS AVENUE SUITE 173 DALLAS, TX 75201

E Check to indicate the parts of Schedule K-3 that apply.		Yes	No
1	Does Part I apply? If "Yes," complete and attach Part I	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Does Part II apply? If "Yes," complete and attach Part II	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	Does Part III apply? If "Yes," complete and attach Part III	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4	Does Part IV apply? If "Yes," complete and attach Part IV	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5	Does Part V apply? If "Yes," complete and attach Part V	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6	Does Part VI apply? If "Yes," complete and attach Part VI	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7	Does Part VII apply? If "Yes," complete and attach Part VII	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8	Does Part VIII apply? If "Yes," complete and attach Part VIII	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9	Does Part IX apply? If "Yes," complete and attach Part IX	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10	Does Part X apply? If "Yes," complete and attach Part X	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11	Does Part XI apply? If "Yes," complete and attach Part XI	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12	Reserved for future use		
13	Does Part XIII apply? If "Yes," complete and attach Part XIII	<input checked="" type="checkbox"/>	<input type="checkbox"/>

For IRS Use Only

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part I Partner's Share of Partnership's Other Current Year International Information

Check box(es) for additional specified attachments. See instructions.

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|---|---|--|---|
| <input checked="" type="checkbox"/> 1. Gain on personal property sale | <input type="checkbox"/> 5. High-taxed income | <input type="checkbox"/> 8. Form 5471 information | <input checked="" type="checkbox"/> 11. Dual consolidated loss |
| <input type="checkbox"/> 2. Foreign oil and gas taxes | <input type="checkbox"/> 6. Section 267A disallowed deduction | <input type="checkbox"/> 9. Other forms | <input checked="" type="checkbox"/> 12. Form 8865 information |
| <input type="checkbox"/> 3. Splitter arrangements | <input type="checkbox"/> 7. Form 8858 information | <input type="checkbox"/> 10. Partner loan transactions | <input checked="" type="checkbox"/> 13. Other international items
(attach description and statement) |
| <input type="checkbox"/> 4. Foreign tax translation | | | |

Part II Foreign Tax Credit Limitation**Section 1—Gross Income**

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)		
1 Sales							
A AA	1,510	1,520	1,530	1,540	1,550	1,560	9,210
B CA	1,570	1,580	1,590	1,600	1,610	1,620	9,570
C EZ	302,664	695,997	775,632	953,406	897,570	3,300	3,628,569
2 Gross income from performance of services							
A AA	6,220	6,240	6,260	6,280	6,300	6,320	37,620
B CA	8,584	8,612	8,638	8,666	8,694	8,722	51,916
C HK	16,346	16,400	16,452	16,504	16,556	16,610	98,868
3 Gross rental real estate income							
A AA	6,400	6,420	6,440	6,460	6,480	6,500	38,700
B CA	7,360	7,384	7,406	7,428	7,452	7,476	44,506
C HK	0	9,734	9,764	9,794	9,824	9,856	48,972
4 Other gross rental income							
A AA	6,600	6,620	6,640	6,660	6,680	6,700	39,900
B CA	7,590	7,612	7,636	7,660	7,682	7,704	45,884
C CJ	0	370,500	0	0	0	0	370,500
5 Guaranteed payments	676,238	34,026	34,124	34,222	34,324	34,426	847,360
6 Interest income							
A AA	4,025	4,036	4,048	4,060	4,071	4,082	24,322
B CA	4,629	4,642	4,655	4,668	4,682	4,695	27,971
C HK	6,122	6,139	6,156	6,174	6,191	6,209	36,991
7 Ordinary dividends (exclude amount on line 8)							
A AA	4,094	4,106	4,117	4,128	4,140	4,152	24,737
B CA	4,708	4,721	4,735	4,748	4,761	4,774	28,447
C HK	6,226	6,244	6,261	6,279	6,296	6,314	37,620

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part II Foreign Tax Credit Limitation (continued)**Section 1 – Gross Income** (continued)

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)		
8 Qualified dividends							
A AA	4,140	4,152	4,163	4,174	4,186	4,198	25,013
B CA	4,761	4,774	4,787	4,801	4,814	4,827	28,764
C HK	6,296	6,314	6,331	6,349	6,366	6,384	38,040
9 Reserved for future use							
10 Royalties and license fees							
A AA	2,870	2,880	2,890	2,900	2,910	2,920	17,370
B CA	2,930	2,940	2,950	2,960	2,970	2,980	17,730
C HK	3,050	3,060	3,070	3,080	3,090	3,100	18,450
11 Net short-term capital gain							
A AA	4,060	4,070	4,080	4,090	4,100	4,110	24,510
B CA	4,120	4,130	4,140	4,150	4,160	4,170	24,870
C HK	4,240	4,250	4,260	4,270	4,280	4,290	25,590
12 Net long-term capital gain							
A AA	4,360	4,370	4,380	4,390	4,400	4,410	26,310
B CA	4,420	4,430	4,440	4,450	4,460	4,470	26,670
C HK	4,540	4,550	4,560	4,570	4,580	4,590	27,390
13 Collectibles (28%) gain							
A AA	4,560	4,570	4,580	4,590	4,600	4,610	27,510
B CA	4,620	4,630	4,640	4,650	4,660	4,670	27,870
C HK	4,740	4,750	4,760	4,770	4,780	4,790	28,590
14 Unrecaptured section 1250 gain							
A AA	4,760	4,770	4,780	4,790	4,800	4,810	28,710
B CA	4,820	4,830	4,840	4,850	4,860	4,870	29,070
C HK	4,940	4,950	4,960	4,970	4,980	4,990	29,790
15 Net section 1231 gain							
A AA	4,960	4,970	4,980	4,990	5,000	5,010	29,910
B CA	5,020	5,030	5,040	5,050	5,060	5,070	30,270
C HK	5,140	5,150	5,160	5,170	5,180	5,190	30,990

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part II Foreign Tax Credit Limitation (continued)**Section 1 – Gross Income** (continued)

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)		
16 Section 986(c) gain	32,769	26,150	26,200	26,250	26,300	26,350	164,019
17 Section 987 gain	29,439	26,150	26,200	26,250	26,300	26,350	160,689
18 Section 988 gain	30,442	27,150	27,200	27,250	27,300	621,350	760,692
19 Section 951(a) inclusions							
A AA	5,360	5,370	5,380	5,390	5,400	5,410	32,310
B CA	5,420	5,430	5,440	5,450	5,460	5,470	32,670
C HK	5,540	5,550	5,560	5,570	5,580	5,590	33,390
20 Other income (see instructions)							
A AA	5,560	5,570	5,580	5,590	5,600	5,610	33,510
B CA	5,620	5,630	5,640	5,650	5,660	5,670	33,870
C HK	5,740	5,750	5,760	5,770	5,780	5,790	34,590
21 Reserved for future use							
A							
B							
C							
22 Reserved for future use							
A							
B							
C							
23 Reserved for future use							
A							
B							
C							
24 Total gross income (combine lines 1 through 23)	5,129,175	1,558,227	1,268,887	1,448,191	1,393,886	1,095,151	11,893,517
A AA	69,479	69,664	69,848	70,032	70,217	70,402	419,642
B CA	76,172	76,375	76,577	76,781	76,985	77,188	460,078
C CJ	0	370,500	0	0	0	0	370,500

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part II Foreign Tax Credit Limitation *(continued)***Section 2—Deductions**

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)		
25 Expenses allocable to sales income	(302,508)	(533,362)	(6,020)	(1,342,842)	(6,040)	(6,050)	(2,196,822)
26 Expenses allocable to gross income from performances of services	(9,454)	(6,110)	(6,120)	(6,130)	(6,140)	(6,150)	(40,104)
27 Net short-term capital loss	(12,914)	(6,210)	(6,220)	(6,230)	(6,240)	(6,250)	(44,064)
28 Net long-term capital loss	(144,294)	(6,310)	(6,320)	(6,330)	(6,340)	(6,350)	(175,944)
29 Collectibles loss	(464,146)	(6,410)	(6,420)	(6,430)	(6,440)	(6,450)	(496,296)
30 Net section 1231 loss	(9,760)	(6,410)	(6,420)	(6,430)	(6,440)	(6,450)	(41,910)
31 Other losses	(9,763)	(6,410)	(6,420)	(6,430)	(6,440)	(6,450)	(41,913)
32 Research & experimental (R&E) expenses							
A SIC code:679						0	0
B SIC code:021						0	0
C SIC code:271						0	0
33 Allocable rental expenses—depreciation, depletion, and amortization	(9,966)	(6,610)	(6,620)	(6,630)	(6,640)	(6,650)	(43,116)
34 Allocable rental expenses—other than depreciation, depletion, and amortization	(10,099)	(6,710)	(6,720)	(6,730)	(6,740)	(6,750)	(43,749)
35 Allocable royalty and licensing expenses—depreciation, depletion, and amortization	(6,800)	(6,810)	(6,820)	(6,830)	(6,840)	(6,850)	(40,950)
36 Allocable royalty and licensing expenses—other than depreciation, depletion, and amortization	(10,305)	(6,910)	(6,920)	(6,930)	(6,940)	(6,950)	(44,955)
37 Depreciation not included on line 33 or 35	(17,514)	(14,120)	(14,140)	(14,160)	(14,180)	(14,200)	(88,314)
38 Charitable contributions	(10,620)						(10,620)
39 Interest expense specifically allocable under Regulations section 1.861-10(e)	(10,623)	(7,210)	(7,220)	(7,230)	(7,240)	(7,250)	(46,773)
40 Other interest expense specifically allocable under Regulations section 1.861-10T	(10,726)	(7,310)	(7,320)	(7,330)	(7,340)	(7,350)	(47,376)
41 Other interest expense—business						(7,450)	(7,450)
42 Other interest expense—investment						(7,550)	(7,550)
43 Other interest expense—passive activity						(7,650)	(7,650)
44 Section 59(e)(2) expenditures, excluding R&E expenses on line 32	(18,149)	(7,710)	(7,720)	(7,730)	(7,740)	(7,750)	(56,799)
45 Foreign taxes not creditable but deductible	(7,800)	(7,810)	(7,820)	(7,830)	(7,840)	(7,850)	(46,950)

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part II Foreign Tax Credit Limitation (continued)**Section 2—Deductions** (continued)

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)		
46 Section 986(c) loss	(7,900)	(7,910)	(7,920)	(7,930)	(7,940)	(7,950)	(47,550)
47 Section 987 loss	(14,981)	(8,010)	(8,020)	(8,030)	(8,040)	(8,050)	(55,131)
48 Section 988 loss	(11,595)	(8,110)	(8,120)	(8,130)	(8,140)	(8,150)	(52,245)
49 Other allocable deductions (see instructions)	(19,998)	(16,520)	(16,540)	(16,560)	(16,580)	(16,600)	(102,798)
50 Other apportioned share of deductions (see instructions)	(3,501)	0	0	0	0	0	(3,501)
51 Reserved for future use							
52 Reserved for future use							
53 Reserved for future use							
54 Total deductions (combine lines 25 through 53)	(1,156,266)	(712,712)	(802,282)	(1,522,692)	(186,140)	1,881,311	(2,498,781)
55 Net income (loss) (subtract line 54 from line 24)	6,285,441	2,270,939	2,071,169	2,970,883	1,580,026	(786,160)	14,392,298

Part III Other Information for Preparation of Form 1116 or 1118**Section 1—R&E Expenses Apportionment Factors**

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code _____) (country code _____)		
1 Gross receipts by SIC code							
A SIC code: 21	130,894	60,060	60,080	0	60,100	0	311,134
B SIC code: 91	120,300	127,612	60,200	0	60,220	0	368,332
C SIC code: 100	317,990	348,475	60,340	0	60,360	0	787,165
D SIC code: 103	120,860	190,976	60,480	0	60,500	0	432,816
E SIC code: 200	230,110	181,720	60,640	0	60,660	0	533,130
F SIC code: 205	339,026	182,200	60,800	0	60,820	0	642,846
2 Exclusive apportionment with respect to total R&E expenses entered on Part II, line 32. Enter the following.							
A R&E expense with respect to activity performed in the United States							
(i) SIC code: 13						2A(i)	(3,436)
(ii) SIC code: 83						2A(ii)	(4,606)
(iii) SIC code: 97						2A(iii)	(6,600)
B R&E expense with respect to activity performed outside the United States							
(i) SIC code: 123						2B(i)	(158,923)
(ii) SIC code: 145						2B(ii)	(10,388)
(iii) SIC code: 205						2B(iii)	(12,998)

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part III Other Information for Preparation of Form 1116 or 1118 (continued)**Section 2—Interest Expense Apportionment Factors**

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code _____) (country code _____)		
1 Total average value of assets	395,193	510,936	1,362,423	941,394	1,023,912	1,129,584	5,363,442
2 Sections 734(b) and 743(b) adjustment to assets—average value	21,300	21,290	21,280	21,270	21,260	21,250	127,650
3 Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)	21,240	21,230	21,220	21,210	21,200	21,190	127,290
4 Other assets attracting directly allocable interest expense under Regulations section 1.861-10T	21,180	21,170	21,160	21,150	21,140	21,130	126,930
5 Assets excluded from apportionment formula	56,120	56,130	56,130	56,130	51,680	327,080	603,270
6a Total assets used for apportionment (subtract the sum of lines 3, 4, and 5 from the sum of lines 1 and 2)	317,953	433,696	1,285,193	864,174	951,152	781,434	4,633,602
b Assets attracting business interest expense	21,060	21,050	21,040	21,030	21,020	21,010	126,210
c Assets attracting investment interest expense	21,000	20,990	20,980	20,970	20,960	20,950	125,850
d Assets attracting passive activity interest expense	20,940	20,930	20,920	20,910	20,900	20,890	125,490
7 Basis in stock of 10%-owned noncontrolled foreign corporations (see attachment)	674,772	0	160,272	39,264	0	0	874,308
8 Basis in stock of CFCs (see attachment)	16,458	23,790	706,263	39,030	0	0	785,541

Section 3—Foreign-Derived Intangible Income (FDII) Deduction Apportionment Factors

Description	(a) U.S. source	Foreign Source			(e) Sourced by partner	(f) Total
		(b) Passive category income	(c) General category income	(d) Other (category code _____) (country code _____)		
1 Foreign-derived gross receipts	30,330	30,340	30,320	30,310	30,300	151,600
2 Cost of goods sold	(30,380)	(30,390)	(30,370)	(30,360)	(30,350)	(151,850)
3 Partnership deductions allocable to foreign-derived gross receipts	(30,430)	(30,440)	(30,420)	(30,410)	(30,400)	(152,100)
4 Other partnership deductions apportioned to foreign-derived gross receipts	(30,480)	(30,490)	(30,470)	(30,460)	(30,450)	(152,350)

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part III Other Information for Preparation of Form 1116 or 1118 (continued)**Section 4—Foreign Taxes**

Description	(a) Type of tax	(b) Section 951A category income		(c) Foreign branch category income		
		U.S.	Foreign	U.S.	Foreign	Partner
1 Direct (section 901 or 903) foreign taxes: <input type="checkbox"/> Paid <input checked="" type="checkbox"/> Accrued						
A AL	WHTD	(480,672)	(30,400)	(30,410)	(30,420)	(31,903)
B EI	WHTD	(33,640)	(33,650)	(33,660)	(33,670)	(33,680)
C FR	WHTD	(33,400)	(33,410)	(33,420)	(33,430)	(33,440)
D IC	WHTD	(33,520)	(33,530)	(33,540)	(33,550)	(33,560)
E KS	WHTD	(33,760)	(33,770)	(33,780)	(33,790)	(33,800)
F MN	WHTD	(34,000)	(34,010)	(34,020)	(34,030)	(34,040)
2 Reduction of taxes (total)						
A Taxes on foreign mineral income	WHTD	(171,360)	(171,440)	(171,520)	(171,600)	(171,680)
B Reserved for future use						
C International boycott provisions	WHTD	(179,360)	(179,440)	(179,520)	(179,600)	(179,680)
D Failure-to-file penalties	WHTD	(187,360)	(187,440)	(187,520)	(187,600)	(187,680)
E Taxes with respect to splitter arrangements . .	WHTD	(195,360)	(195,440)	(195,520)	(195,600)	(195,680)
F Taxes on foreign corporate distributions . . .	WHTD	(203,360)	(203,440)	(203,520)	(203,600)	(203,680)
G Other	WHTD	(211,360)	(211,440)	(211,520)	(211,600)	(211,680)
3 Foreign tax redeterminations						
A AF						
Related tax year: 2022						
Date tax paid: 01/08/2022						
Contested tax <input type="checkbox"/>	WHTP	(30,010)	(170,046)	(30,020)	(30,030)	(30,040)
B GT						
Related tax year: 2021						
Date tax paid: 11/03/2021						
Contested tax <input type="checkbox"/>	WHTP	0	(475,200)	0	0	0
C GT						
Related tax year: 2022						
Date tax paid: 01/08/2022						
Contested tax <input type="checkbox"/>	WHTP	(30,130)	(30,120)	(30,140)	(30,150)	(30,160)
4 Reserved for future use						
5 Reserved for future use						
6 Reserved for future use						

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part III Other Information for Preparation of Form 1116 or 1118 (continued)**Section 4—Foreign Taxes** (continued)

	(d) Passive category income			(e) General category income			(f) Other (category code _____)	(g) Total
	U.S.	Foreign	Partner	U.S.	Foreign	Partner		
1								
A	(30,430)	(30,440)	(30,450)	(30,460)	(30,470)	(30,480)	(34,100)	(820,635)
B	(33,690)	(33,700)	(33,710)	(33,720)	(33,730)	(33,740)	(33,750)	(404,340)
C	(33,450)	(33,460)	(33,470)	(33,480)	(33,490)	(33,500)	(33,510)	(401,460)
D	(33,570)	(33,580)	(33,590)	(33,600)	(33,610)	(33,620)	(33,630)	(402,900)
E	(33,810)	(33,820)	(33,830)	(33,840)	(33,850)	(33,860)	(33,870)	(405,780)
F	(34,050)	(34,060)	(34,070)	(34,080)	(34,090)	(34,100)	(34,110)	(408,660)
2								
A	(171,760)	(171,840)	(171,920)	(172,000)	(172,080)	(172,160)	(172,240)	(2,061,600)
B								
C	(179,760)	(179,840)	(179,920)	(180,000)	(180,080)	(180,160)	(180,240)	(2,157,600)
D	(187,760)	(187,840)	(187,920)	(188,000)	(188,080)	(188,160)	(188,240)	(2,253,600)
E	(195,760)	(195,840)	(195,920)	(196,000)	(196,080)	(196,160)	(196,240)	(2,349,600)
F	(203,760)	(203,840)	(203,920)	(204,000)	(204,080)	(204,160)	(204,240)	(2,445,600)
G	(211,760)	(211,840)	(211,920)	(212,000)	(212,080)	(212,160)	(212,240)	(2,541,600)
3								
A	(30,050)	(30,060)	(30,070)	(30,080)	(30,090)	(30,100)	(30,110)	(500,706)
B	0	0	0	0	0	0	0	(475,200)
C	(30,170)	(30,180)	(30,190)	(30,200)	(30,210)	(30,220)	(30,230)	(362,100)
4								
5								
6								

Section 5—Other Tax Information

Description	(a) U.S. source	Foreign Source					(g) Sourced by partner	(h) Total
		(b) Section 951A category income	(c) Foreign branch category income	(d) Passive category income	(e) General category income	(f) Other (category code _____) (country code _____)		
1 Section 743(b) positive income adjustment .	100,000	99,980	99,960	99,940	99,920	99,900	99,880	699,580
2 Section 743(b) negative income adjustment .	(99,860)	(99,840)	(99,820)	(99,800)	(99,780)	(99,760)	(99,740)	(698,600)
3 Reserved for future use . .								
4 Reserved for future use . .								

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part IV Information on Partner's Section 250 Deduction With Respect to Foreign-Derived Intangible Income (FDII)**Section 1—Information To Determine Deduction Eligible Income (DEI) and Qualified Business Asset Investment (QBAI) on Form 8993**

1 Net income (loss)	1	1,682,156
2a DEI gross receipts	2a	46,000
b DEI cost of goods sold (COGS)	2b	(47,000)
c DEI properly allocated and apportioned deductions	2c	(48,000)
3 Section 951(a) inclusions	3	49,000
4 CFC dividends	4	50,000
5 Financial services income	5	51,000
6 Domestic oil and gas extraction income	6	52,000
7 Foreign branch income	7	53,000
8 Partnership QBAI	8	54,000

Section 2—Information To Determine Foreign-Derived Deduction Eligible Income on Form 8993 (see instructions)

	(a) Foreign-derived income from all sales of general property	(b) Foreign-derived income from all sales of intangible property	(c) Foreign-derived income from all services	(d) Total (add columns (a) through (c))
9 Gross receipts	18,100	18,080	18,060	54,240
10 COGS	0	(20,080)	(20,060)	(40,140)
11 Allocable deductions	(22,100)	(22,080)	(22,060)	(66,240)
12 Other apportioned deductions				12 (24,246)

Section 3—Other Information for Preparation of Form 8993

	(a) DEI	(b) FDDEI	(c) Total
13 Interest deductions			
A Interest expense specifically allocable under Regulations section 1.861-10(e)	(1,392,134)	(15,000)	(1,391,634)
B Other interest expense specifically allocable under Regulations section 1.861-10T	(516,520)	(51,511)	(568,031)
C Other interest expense			0
14 Interest expense apportionment factors			
A Total average value of assets	16,000	16,500	49,500
B Sections 734(b) and 743(b) adjustment to assets—average value	17,500	18,000	54,000
C Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)	19,000	19,500	58,500
D Other assets attracting directly allocable interest expense under Regulations section 1.861-10T	20,500	21,000	63,000
E Assets excluded from apportionment formula	22,500	23,000	67,500
F Total assets used for apportionment (the sum of lines 14C, 14D, and 14E subtracted from the sum of lines 14A and 14B)	23,500	(29,000)	(85,500)
R&E expenses apportionment factors			
15 Gross receipts by SIC code			
A SIC code:100	14,022,118	0	14,022,118
B SIC code:200	324,016	0	324,016
C SIC code:811	78,750	0	78,750
16 R&E expenses by SIC code			
A SIC code:100			16A (63,000)
B SIC code:200			16B (897,750)
C SIC code:811			16C (94,500)

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part V Distributions From Foreign Corporations to Partnership

(a) Name of distributing foreign corporation				(b) EIN or reference ID number	(c) Date of distribution	(d) Functional currency of distributing foreign corporation	(e) Amount of distribution in functional currency
A	FOREIGN CORP A			98-1295467	20211104	BRL	1,132,800
B	FOREIGN CORP B			98-1295468	20220110	EUR	100,100
C	FOREIGN CORP C			98-1295469	20220131	AUD	100,200
D	FOREIGN CORP D			98-1295470	20220221	USD	100,300
E	FOREIGN CORP E			98-1295471	20220314	USD	100,400
F	FOREIGN CORP F			98-1295472	20220404	USD	100,500
G	FOREIGN CORP G			98-1295473	20220425	USD	100,600
H	FOREIGN CORP H			98-1295474	20220516	USD	100,700
I	FOREIGN CORP I			98-1295475	20220606	USD	100,800
J	FOREIGN CORP J			98-1295476	20220627	USD	100,900
K	FOREIGN CORP K			98-1295477	20220718	USD	101,000
L	FOREIGN CORP L			98-1295478	20220808	USD	101,100
M	FOREIGN CORP M			98-1295479	20220829	USD	101,200
N	FOREIGN CORP N			98-1295480	20220910	USD	102,200
O	FOREIGN CORP O			98-1295481	20221015	USD	104,200
	(f) Amount of E&P distribution in functional currency	(g) Spot rate (functional currency to U.S. dollars)	(h) Amount of distribution in U.S. dollars	(i) Amount of E&P distribution in U.S. dollars	(j) Qualified foreign corporation	(k) Reserved for future use	
A	0	1	1,132,800	0	<input checked="" type="checkbox"/>		
B	100,120	1	100,100	100,120	<input checked="" type="checkbox"/>		
C	100,220	1	100,200	100,220	<input checked="" type="checkbox"/>		
D	100,320	1	100,300	100,320	<input checked="" type="checkbox"/>		
E	100,420	1	100,400	100,420	<input checked="" type="checkbox"/>		
F	100,520	1	100,500	100,520	<input checked="" type="checkbox"/>		
G	100,620	1	100,600	100,620	<input checked="" type="checkbox"/>		
H	100,720	1	100,700	100,720	<input checked="" type="checkbox"/>		
I	100,820	1	100,800	100,820	<input checked="" type="checkbox"/>		
J	100,920	1	100,900	100,920	<input checked="" type="checkbox"/>		
K	101,020	1	101,000	101,020	<input checked="" type="checkbox"/>		
L	101,120	1	101,100	101,120	<input checked="" type="checkbox"/>		
M	101,220	1	101,200	101,220	<input checked="" type="checkbox"/>		
N	102,400	1	102,200	102,400	<input checked="" type="checkbox"/>		
O	104,400	1	104,200	104,400	<input checked="" type="checkbox"/>		

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part VI Information on Partner's Section 951(a)(1) and Section 951A Inclusions

- a** Separate category (enter code) GEN
- b** If box is checked, this is completed with respect to U.S. source income ☒

	(a) Name of CFC	(b) EIN or reference ID number	(c) Ending of CFC tax year	(d) Partner's share of CFC items through its ownership in the partnership	(e) Partner's share of subpart F income	(f) Partner's section 951(a)(1)(B) inclusion	(g) Tested income
A	CFC A	CFC A ID	20210916	97050	248,532	0	1
B	CFC B	CFCB ID		163188	112,914	136,986	1,000
C	CFC C	CFCC ID		150192	122,490	131,514	2,000
D				0	0	0	0
E				0	0	0	0
F				0	0	0	0
G				0	0	0	0
H				0	0	0	0
I				0	0	0	0
J				0	0	0	0
K				0	0	0	0
1	Partner's total (sum for all CFCs)				483,936	268,500	3,001

	(h) Tested loss	(i) Partner's share of tested income	(j) Partner's share of tested loss	(k) Partner's share of Qualified Business Asset Investment (QBAI)	(l) Partner's share of the tested loss QBAI amount	(m) Partner's share of tested interest income	(n) Partner's share of tested interest expense
A	(9)	159,690	(174,186)	191,418	214,806	234,774	(260,214)
B	(800)	160,374	(181,710)	198,942	214,122	233,406	(258,846)
C	(900)	150,798	(172,818)	190,734	215,490	235,458	(262,950)
D							
E							
F							
G							
H							
I							
J							
K							
1	(1,709)	470,862	(528,714)	581,094	644,418	703,638	(782,010)

Name of partnership	EIN	Name of partner	SSN or TIN
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Part VI Information on Partner's Section 951(a)(1) and Section 951A Inclusions

- a** Separate category (enter code) PAS
- b** If box is checked, this is completed with respect to U.S. source income ☒

	(a) Name of CFC	(b) EIN or reference ID number	(c) Ending of CFC tax year	(d) Partner's share of CFC items through its ownership in the partnership	(e) Partner's share of subpart F income	(f) Partner's section 951(a)(1)(B) inclusion	(g) Tested income
A	CFC D		20210901	157716	124,542	136,302	0
B	CFC E		20210902	148824	121,806	132,882	0
C	CFC F		20210903	160452	114,966	137,670	0
D	CFC G		20210904	159084	115,650	138,354	0
E	CFC H		20210905	167292	113,598	133,566	0
F							
G							
H							
I							
J							
K							
1	Partner's total (sum for all CFCs)				590,562	678,774	0

	(h) Tested loss	(i) Partner's share of tested income	(j) Partner's share of tested loss	(k) Partner's share of Qualified Business Asset Investment (QBAI)	(l) Partner's share of the tested loss QBAI amount	(m) Partner's share of tested interest income	(n) Partner's share of tested interest expense
A	0	150,114	(171,450)	196,890	206,598	228,618	(262,266)
B	0	152,166	(183,078)	192,102	207,282	236,142	(260,898)
C	0	161,742	(175,554)	189,366	216,174	227,934	(263,634)
D	0	156,270	(174,870)	190,050	205,914	226,566	(265,002)
E	0	154,902	(176,238)	197,574	208,650	229,302	(264,318)
F							
G							
H							
I							
J							
K							
1	0	775,194	(881,190)	965,982	1,044,618	1,148,562	(1,316,118)

Name of partnership	EIN	Name of partner	SSN or TIN
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Part VI Information on Partner's Section 951(a)(1) and Section 951A Inclusions

- a** Separate category (enter code) GEN
- b** If box is checked, this is completed with respect to U.S. source income ☐

	(a) Name of CFC	(b) EIN or reference ID number	(c) Ending of CFC tax year	(d) Partner's share of CFC items through its ownership in the partnership	(e) Partner's share of subpart F income	(f) Partner's section 951(a)(1)(B) inclusion	(g) Tested income
A	FOREIGN CORP A	98-1295467		656466.72	0	0	100
B							
C							
D							
E							
F							
G							
H							
I							
J							
K							
1	Partner's total (sum for all CFCs)				0	0	100

	(h) Tested loss	(i) Partner's share of tested income	(j) Partner's share of tested loss	(k) Partner's share of Qualified Business Asset Investment (QBAI)	(l) Partner's share of the tested loss QBAI amount	(m) Partner's share of tested interest income	(n) Partner's share of tested interest expense
A	200	0	0	0	0	0	0
B							
C							
D							
E							
F							
G							
H							
I							
J							
K							
1	200	0	0	0	0	0	0

Name of partnership	EIN	Name of partner	SSN or TIN
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Part VI Information on Partner's Section 951(a)(1) and Section 951A Inclusions

- a** Separate category (enter code) PAS
- b** If box is checked, this is completed with respect to U.S. source income ☐

	(a) Name of CFC	(b) EIN or reference ID number	(c) Ending of CFC tax year	(d) Partner's share of CFC items through its ownership in the partnership	(e) Partner's share of subpart F income	(f) Partner's section 951(a)(1)(B) inclusion	(g) Tested income
A	CFC I		20210906	159768	114,282	132,198	0
B	CFC J		20210907	155664	116,334	139,722	0
C	CFC K		20210908	161820	118,386	140,406	0
D	CFC L		20210909	157032	117,018	139,038	0
E	CFC M		20210901	148140	119,070	129,462	0
F	CFC N		20210902	145404	123,174	134,250	0
G	CFC O		20210903	160452	117,702	134,934	0
H	CFC P		20210904	153612	120,438	135,618	0
I	CFC Q		20210905	161136	121,122	130,146	0
J	CFC R		20210906	147456	112,230	130,830	0
K	CFC T		20210908	161136	123,858	141,090	0
1	Partner's total (sum for all CFCs)				2,347,714	1,487,694	100

	(h) Tested loss	(i) Partner's share of tested income	(j) Partner's share of tested loss	(k) Partner's share of Qualified Business Asset Investment (QBAI)	(l) Partner's share of the tested loss QBAI amount	(m) Partner's share of tested interest income	(n) Partner's share of tested interest expense
A	0	153,534	(178,290)	194,154	216,858	225,882	(269,790)
B	0	155,586	(177,606)	198,258	207,966	227,250	(261,582)
C	0	161,058	(178,974)	194,838	210,702	223,830	(257,478)
D	0	154,218	(182,394)	193,470	212,070	232,038	(266,370)
E	0	158,322	(179,658)	196,206	209,334	229,986	(265,686)
F	0	152,850	(176,922)	195,522	211,386	232,722	(259,530)
G	0	157,638	(180,342)	186,630	204,546	225,198	(268,422)
H	0	159,006	(172,134)	187,314	212,754	230,670	(267,054)
I	0	156,954	(170,766)	192,786	210,018	224,514	(267,738)
J	0	149,430	(181,026)	187,998	205,230	234,090	(269,106)
K	0	151,482	(173,502)	188,682	213,438	231,354	(258,162)
1	200	1,710,078	(1,951,614)	2,115,858	2,314,302	2,517,534	(2,910,918)

Name of partnership	EIN	Name of partner	SSN or TIN
K-3 ALL PARTS	99-9999999	173 - PWC ENTITY 173 - NAME LINE 2	APPLIED FOR

Part VII Information To Complete Form 8621**Section 1 – General Information on Passive Foreign Investment Company (PFIC), Qualified Electing Fund (QEF), or Qualifying Insurance Corporation (QIC)****General Information**

(a) Name of PFIC	(b) EIN or reference ID number	(c) Address of PFIC	(d) Beginning of PFIC tax year	(e) Ending of PFIC tax year
BEIJING MEILISHIKONG NETWORK AND TECHNOLOGY CO., L			20210101	20211231
PFIC A	11-1111111	100 PFIC LANE	20220101	20221231
PFIC B	11-1111111	200 PFIC LANE	20220103	20221231
PFIC C	11-1111111	300 PFIC LANE	20220104	20221231
PFIC D	11-1111111	400 PFIC LANE	20220105	20221231
PFIC E	11-1111111	500 PFIC LANE	20220106	20221231
PFIC F	11-1111111	600 PFIC LANE	20220107	20221231
PFIC G	11-1111111	700 PFIC LANE	20220108	20221231
PFIC H	11-1111111	800 PFIC LANE	20220109	20221231
PFIC I	11-1111111	900 PFIC LANE	20220110	20221231
PFIC J	11-1111111	1000 PFIC LANE	20220111	20221231
PFIC K	11-1111111	1100 PFIC LANE	20220112	20221231

Summary of Annual Information**Information Regarding Elections**

(f) Description of each class of PFIC shares	(g) Dates PFIC shares acquired during tax year (if applicable)	(h) Partner's share of total number of PFIC shares held by partnership at end of tax year	(i) Partner's share of total value of PFIC shares held by partnership at end of tax year	(j) Election made by partnership (see instructions)	(k) Box is checked if foreign corporation has documented its eligibility to be treated as a qualifying insurance corporation under section 1297(f)(2).	(l) Box is checked if PFIC has indicated its shares are "marketable stock" within the meaning of section 1296(e).	(m) Box is checked if PFIC is also a controlled foreign corporation (CFC) within the meaning of section 957.	(n) Box is checked if PFIC meets the income test or asset test of section 1297(a) for the tax year.
		0	0		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COM	20220301	59,400	59,500		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PRE	20220101	0	0	QEF	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
OTH		600,000	700,000		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VAR		660,000	770,000		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COM		726,000	847,000		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PRE		798,600	931,700		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTH		878,460	1,024,870		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VAR		966,306	1,127,356		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
COM		1,062,936	1,240,092		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
PRE		1,169,230	1,364,102		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTH		1,286,154	1,500,512		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part VII Information To Complete Form 8621 (continued)**Section 2—Additional Information on PFIC or QEF**

General Information		QEF Information		Mark-to-Market Information		Section 1291 and Other Information
(a) Name of PFIC	(b) EIN or reference ID number	(c) Partner's share of ordinary earnings	(d) Partner's share of net capital gain	(e) Partner's share of fair market value of PFIC shares held by partnership at beginning of tax year	(f) Partner's share of fair market value of PFIC shares held by partnership at end of tax year	(g) Dates PFIC shares were acquired
BEIJING MEILISHIKONG NETWORK AND TE		0	1,280,000	0	0	
PFIC A	11-1111111	0	0	200,000	0	20220301
PFIC B	11-1111111	1,980,000	0	0	0	20220101
PFIC C	11-1111111	62,000	66,000	70,000	26,000	
PFIC D	11-1111111	68,200	72,600	77,000	28,600	
PFIC E	11-1111111	75,020	79,860	84,700	31,460	
PFIC F	11-1111111	82,522	87,846	93,170	34,606	
PFIC G	11-1111111	90,774	96,630	102,488	38,066	
PFIC H	11-1111111	99,852	106,294	112,736	41,874	
PFIC I	11-1111111	109,836	116,924	124,010	46,060	
PFIC J	11-1111111	120,820	128,616	136,410	50,666	
PFIC K	11-1111111	132,902	141,476	150,052	55,734	

Section 1291 and Other Information

(h) Partner's share of amount of cash and fair market value of property distributed by PFIC during the current tax year (if applicable)	(i) Dates of distribution	(j) Partner's share of total creditable foreign taxes attributable to distribution by PFIC	(k) Partner's share of total distributions from PFIC in preceding 3 tax years	(l) Dates PFIC shares disposed of during tax year (if applicable)	(m) Partner's share of amount realized by partnership on disposition of PFIC shares	(n) Partner's share of partnership's tax basis in PFIC shares on dates of disposition (including partner-specific adjustments)	(o) Partner's share of gain (loss) on disposition by partnership of PFIC shares
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
90,000	20220301	120,000	122,000	20220301	124,000	126,000	128,000
99,000	20220301	132,000	134,200	20220301	136,400	138,600	140,800
108,900	20220301	145,200	147,620	20220301	150,040	152,460	154,880
119,790	20220301	159,720	162,382	20220301	165,044	167,706	170,368
131,768	20220301	175,692	178,620	20220301	181,548	184,476	187,404
144,946	20220301	193,262	196,482	20220301	199,704	202,924	206,146
159,440	20220301	212,588	216,130	20220301	219,674	223,216	226,760
175,384	20220301	233,846	237,744	20220301	241,640	245,538	249,436
192,922	20220301	257,230	261,518	20220301	265,804	270,092	274,380

Name of partnership	EIN	Name of partner	SSN or TIN
K-3 ALL PARTS	99-9999999	173 - PWC ENTITY 173 - NAME LINE 2	APPLIED FOR

Part VII Information To Complete Form 8621**Section 1 – General Information on Passive Foreign Investment Company (PFIC), Qualified Electing Fund (QEF), or Qualifying Insurance Corporation (QIC)****General Information**

(a) Name of PFIC	(b) EIN or reference ID number	(c) Address of PFIC	(d) Beginning of PFIC tax year	(e) Ending of PFIC tax year
PFIC L	11-1111111	1200 PFIC LANE	20220113	20221231
PFIC M	11-1111111	1300 PFIC LANE	20220114	20221231

Summary of Annual Information**Information Regarding Elections**

(f) Description of each class of PFIC shares	(g) Dates PFIC shares acquired during tax year (if applicable)	(h) Partner's share of total number of PFIC shares held by partnership at end of tax year	(i) Partner's share of total value of PFIC shares held by partnership at end of tax year	(j) Election made by partnership (see instructions)	(k) Box is checked if foreign corporation has documented its eligibility to be treated as a qualifying insurance corporation under section 1297(f)(2).	(l) Box is checked if PFIC has indicated its shares are "marketable stock" within the meaning of section 1296(e).	(m) Box is checked if PFIC is also a controlled foreign corporation (CFC) within the meaning of section 957.	(n) Box is checked if PFIC meets the income test or asset test of section 1297(a) for the tax year.
VAR		1,414,768	1,650,564		<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
COM		1,556,246	1,815,620		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
					<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 2—Additional Information on PFIC or QEF

Section 1291 and Other Information

Schedule K-3 (Form 1065) 2022

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part VIII Partner's Interest in Foreign Corporation Income (Section 960)

A EIN or reference ID number of controlled foreign corporation . . . CFC A ID	B Separate category. See instructions GEN
C If PAS was entered on line B, applicable grouping under Regulations section 1.904-4(c). See instructions	
D Box is checked if there is more than one source country for a line. See attachment and instructions	<input checked="" type="checkbox"/>
E Box is checked if U.S. source income	<input type="checkbox"/>
F Box is checked if FORI or FOGEI	<input type="checkbox"/>

Amounts are in functional currency unless otherwise noted. See instructions.	(i) Country code	(ii) Partner's share of net income	(iii) Reserved for future use	(iv) Reserved for future use
1 Subpart F income groups				
a Dividends, interest, rents, royalties, and annuities (total)		2,474,223		
(1) Unit: UNIT 123	US	6,000		
(2) Unit: UNIT 456	US	6,300		
b Net gain from certain property transactions (total)		26,520		
(1) Unit: UNIT 123	US	6,020		
(2) Unit: UNIT 456	US	6,320		
c Net gain from commodities transactions (total)		26,640		
(1) Unit: UNIT 123	US	6,040		
(2) Unit: UNIT 456	US	6,340		
d Net foreign currency gain (total)		26,760		
(1) Unit: UNIT 123	US	6,060		
(2) Unit: UNIT 456	US	6,360		
e Income equivalent to interest (total)		0		
(1) Unit:		0		
(2) Unit:				
f Other		0		
(1) Unit:				
(2) Unit:				
g Foreign base company sales income (total)		27,000		
(1) Unit: UNIT 123	US	6,100		
(2) Unit: UNIT 456	US	6,400		
h Foreign base company services income (total)		0		
(1) Unit:				
(2) Unit:				
i Full inclusion foreign base company income (total)		0		
(1) Unit:				
(2) Unit:				
j Insurance income (total)		0		
(1) Unit:				
(2) Unit:				
k International boycott income (total)		0		
l Bribes, kickbacks, and other payments (total)		0		
m Section 901(j) (total)		0		

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part VIII Partner's Interest in Foreign Corporation Income (Section 960) (continued)

<i>Amounts are in functional currency unless otherwise noted. See instructions.</i>		(i) Country code	(ii) Partner's share of net income	(iii) Reserved for future use	(iv) Reserved for future use
2	Recaptured subpart F income	BR	2,440		
3	Tested income group (total)		27,960		
	(1) Unit: UNIT 123	US	6,260		
	(2) Unit: UNIT 456	US	6,560		
4	Residual income group (total)		28,080		
	(1) Unit: UNIT 123	US	6,280		
	(2) Unit: UNIT 456	US	6,580		
5	Total		2,665,023		

Part IX Partner's Information for Base Erosion and Anti-Abuse Tax (Section 59A)**Section 1—Applicable Taxpayer** (see instructions)

Description	(a) Total	(b) Total ECI gross receipts	(c) Total non-ECI gross receipts
1 Gross receipts for section 59A(e)	0	0	0
2 Gross receipts for the first preceding year	0	0	0
3 Gross receipts for the second preceding year	0	0	0
4 Gross receipts for the third preceding year	0	0	0
5 Amounts included in the denominator of the base erosion percentage as described in Regulations section 1.59A-2(e)(3)	0		

Section 2—Base Erosion Payments and Base Erosion Tax Benefits (see instructions)

Description	(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
6 Reserved for future use			
7 Reserved for future use			
8 Purchase or creations of property rights for intangibles (patents, trademarks, etc.)	0	0	0
9 Rents, royalties, and license fees	0	0	0
10a Compensation/consideration paid for services not excepted by section 59A(d)(5)	0	0	0
b Compensation/consideration paid for services excepted by section 59A(d)(5)	0		
11 Interest expense	0	0	0
12 Payments for the purchase of tangible personal property	0	0	0
13 Premiums and/or other considerations paid or accrued for insurance and reinsurance as covered by sections 59A(d)(3) and 59A(c)(2)(A)(iii)	0	0	0
14a Nonqualified derivative payments	0	0	0
b Qualified derivative payments excepted by section 59A(h)	0		
15 Payments reducing gross receipts made to surrogate foreign corporation	0	0	0
16 Other payments—specify:	0	0	0
17 Base erosion tax benefits related to payments reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at the 30% (0.30) statutory withholding tax rate			0

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part VIII Partner's Interest in Foreign Corporation Income (Section 960)

A EIN or reference ID number of controlled foreign corporation . . . CFC 10	B Separate category. See instructions PAS
C If PAS was entered on line B, applicable grouping under Regulations section 1.904-4(c). See instructions I	
D Box is checked if there is more than one source country for a line. See attachment and instructions	<input checked="" type="checkbox"/>
E Box is checked if U.S. source income	<input type="checkbox"/>
F Box is checked if FORI or FOGEI	<input checked="" type="checkbox"/>

Amounts are in functional currency unless otherwise noted. See instructions.	(i) Country code	(ii) Partner's share of net income	(iii) Reserved for future use	(iv) Reserved for future use
1 Subpart F income groups				
a Dividends, interest, rents, royalties, and annuities (total)		14,100		
(1) Unit: UNIT A	AF	4,400		
(2) Unit: UNIT B	IT	4,700		
b Net gain from certain property transactions (total)		14,160		
(1) Unit: UNIT A	AF	4,420		
(2) Unit: UNIT B	IT	4,720		
c Net gain from commodities transactions (total)		14,220		
(1) Unit: UNIT A	AF	4,440		
(2) Unit: UNIT B	IT	4,740		
d Net foreign currency gain (total)		14,280		
(1) Unit: UNIT A	AF	4,460		
(2) Unit: UNIT B	IT	4,760		
e Income equivalent to interest (total)				
(1) Unit:				
(2) Unit:				
f Other		769,470		
(1) Unit: UNIT A	AF	769,470		
(2) Unit:				
g Foreign base company sales income (total)		14,400		
(1) Unit: UNIT A	AF	4,500		
(2) Unit: UNIT B	IT	4,800		
h Foreign base company services income (total)				
(1) Unit:				
(2) Unit:				
i Full inclusion foreign base company income (total)				
(1) Unit:				
(2) Unit:				
j Insurance income (total)				
(1) Unit:				
(2) Unit:				
k International boycott income (total)				
l Bribes, kickbacks, and other payments (total)				
m Section 901(j) (total)				

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part VIII Partner's Interest in Foreign Corporation Income (Section 960) (continued)

<i>Amounts are in functional currency unless otherwise noted. See instructions.</i>		(i) Country code	(ii) Partner's share of net income	(iii) Reserved for future use	(iv) Reserved for future use
2	Recaptured subpart F income	AF	4,640		
3	Tested income group (total)		14,880		
	(1) Unit: UNIT A	AF	4,660		
	(2) Unit: UNIT B	IT	4,960		
4	Residual income group (total)		14,940		
	(1) Unit: UNIT A	AF	4,680		
	(2) Unit: UNIT B	IT	4,980		
5	Total		885,270		

Part IX Partner's Information for Base Erosion and Anti-Abuse Tax (Section 59A)**Section 1—Applicable Taxpayer** (see instructions)

Description	(a) Total	(b) Total ECI gross receipts	(c) Total non-ECI gross receipts
1 Gross receipts for section 59A(e)	268,200	89,850	178,350
2 Gross receipts for the first preceding year	89,700	89,550	150
3 Gross receipts for the second preceding year	89,400	89,250	150
4 Gross receipts for the third preceding year	89,100	88,950	150
5 Amounts included in the denominator of the base erosion percentage as described in Regulations section 1.59A-2(e)(3)	(88,800)		

Section 2—Base Erosion Payments and Base Erosion Tax Benefits (see instructions)

Description	(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
6 Reserved for future use			
7 Reserved for future use			
8 Purchase or creations of property rights for intangibles (patents, trademarks, etc.)		85,950	85,800
9 Rents, royalties, and license fees		85,650	85,500
10a Compensation/consideration paid for services not excepted by section 59A(d)(5)			88,650
b Compensation/consideration paid for services excepted by section 59A(d)(5)	88,350		
11 Interest expense	2,443,419	5,842,740	3,139,467
12 Payments for the purchase of tangible personal property		88,050	87,900
13 Premiums and/or other considerations paid or accrued for insurance and reinsurance as covered by sections 59A(d)(3) and 59A(c)(2)(A)(iii)		87,750	87,600
14a Nonqualified derivative payments		87,450	87,300
b Qualified derivative payments excepted by section 59A(h)	87,150		
15 Payments reducing gross receipts made to surrogate foreign corporation		86,850	86,700
16 Other payments—specify:		172,950	
17 Base erosion tax benefits related to payments reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at the 30% (0.30) statutory withholding tax rate			

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part IX Partner's Information for Base Erosion and Anti-Abuse Tax (Section 59A) (continued)**Section 2—Base Erosion Payments and Base Erosion Tax Benefits** (see instructions) (continued)

	(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
18 Portion of base erosion tax benefits reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at reduced withholding rate pursuant to income tax treaty. Multiply ratio of percentage withheld divided by 30% (0.30) times tax benefit. See instructions			0
19 Total base erosion tax benefits (subtract the sum of lines 17 and 18 from the sum of lines 8 through 16)			0
20 Reserved for future use			
21 Reserved for future use			
22 Reserved for future use			

Part X Foreign Partner's Character and Source of Income and Deductions**Section 1—Gross Income**

Description	(a) Total	(b) Partner determination	Partnership Determination				
			ECI		Non-ECI		
			(c) U.S. source	(d) Foreign source	(e) U.S. source (FDAP)	(f) U.S. source (other)	(g) Foreign source
1 Ordinary business income (gross)	596,318	227,324	73,662	71,610	72,294	76,398	75,030
2 Gross rental real estate income	853,028	240,000	0	0	613,028	0	0
3 Other gross rental income	260,000	260,000	0	0	0	0	0
4 Guaranteed payments for services	248,000	0	0	0	248,000	0	0
5 Guaranteed payments for use of capital	300,000	300,000	0	0	0	0	0
6 Interest income	600,000	300,000	0	0	300,000	0	0
7 Dividends	300,000	0	0	0	300,000	0	0
8 Dividend equivalents	358,000	0	198,000	0	160,000	0	0
9 Royalties and license fees	352,240	52,240	0	300,000	0	0	0
10 Net short-term capital gain	300,000	300,000	0	0	0	0	0
11 Net long-term capital gain	600,000	0	300,000	0	0	0	300,000
12 Collectibles (28%) gain	525,820	0	525,820	225,820	0	0	0
13 Unrecaptured section 1250 gain	300,000	300,000	0	0	0	0	0
14 Net section 1231 gain	1,920,000	1,600,000	320,000	0	0	0	0
15 Reserved for future use							
16 Reserved for future use							
17 Reserved for future use							
18 Reserved for future use							
19 Reserved for future use							
20 Other income (loss) not included on lines 1 through 19	20,498,906	125,226	20,271,842	20,101,838	0	0	0
21 Gross income (sum of lines 1 through 20)	28,012,312	3,704,790	21,689,324	20,699,268	1,693,322	76,398	375,030

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part X Foreign Partner's Character and Source of Income and Deductions *(continued)***Section 2—Deductions, Losses, and Net Income**

Description	(a) Total	(b) Partner determination	Partnership Determination				
			ECI		Non-ECI		
			(c) U.S. source	(d) Foreign source	(e) U.S. source (FDAP)	(f) U.S. source (other)	(g) Foreign source
1 Expenses related to ordinary business income (gross)	(246,000)	(246,000)	0	0	0	0	0
2 Research and experimental expenses	(280,337)	(34,337)	(246,000)	0	0	0	0
3 Expenses from rental real estate	(246,000)	0	0	0	0	0	(246,000)
4 Expenses from other rental activities	(246,000)	(246,000)	0	0	0	0	0
5 Royalty and licensing expenses	(246,000)	(246,000)	0	0	0	0	0
6 Section 179 deduction	(246,000)	0	(246,000)	0	0	0	0
7 Interest expense on U.S.-booked liabilities	(246,000)	(246,000)	0	0	0	0	0
8 Interest expense directly allocable under Regulations sections 1.882-5(a)(1)(ii)(B) and 1.861-10T	(246,000)	0	0	0	0	(246,000)	0
9 Other interest expense	(246,000)	0	0	0	0	0	(246,000)
10 Section 59(e)(2) expenditures	(246,000)	(246,000)	0	0	0	0	0
11 Net short-term capital loss	(237,396)	(246,000)	0	0	0	2,868	5,736
12 Net long-term capital loss	(297,470)	0	(51,470)	0	(246,000)	0	0
13 Collectibles loss	(400,634)	0	(154,634)	0	0	0	(246,000)
14 Net section 1231 loss	(246,000)	(246,000)	0	0	0	0	0
15 Other losses							
(1) DEPLETABLE ASSETS	(20,000,019,536)	0	0	0	(20,000,019,536)	0	0
(2) WILL THIS PRINT ON THE K-3	(2,243,132)	(243,132)	0	0	(2,000,000)	0	0
16 Charitable contributions	(1,280,000)		(1,280,000)				
17 Other: WILL THIS PRINT ON THE K-3	(4,000,000)	0	(4,000,000)	(4,000,000)	0	0	0
18 Other: STMT	(18,858)	0	(18,858)	0	0	0	(21,726)
19 Reserved for future use							
20 Reserved for future use							
21 Reserved for future use							
22 Reserved for future use							
23 Reserved for future use							
24 Total (sum of lines 1 through 23)	(20,011,225,891)	(1,987,997)	(5,996,962)	(4,000,000)	(20,002,265,536)	(243,132)	(753,990)
25 Net income (loss) (line 21 (Section 1) minus line 24 (Section 2))	20,039,238,203						

Name of partnership K-3 ALL PARTS	EIN 99-9999999	Name of partner 173 - PWC ENTITY 173 - NAME LINE 2	SSN or TIN APPLIED FOR
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Part X Foreign Partner's Character and Source of Income and Deductions *(continued)***Section 3—Allocation and Apportionment Methods for Deductions**

1 Gross income			
a Gross ECI		2,000,424,200	
b Worldwide gross income		246,000	
2 Assets			
a Average U.S. assets (inside basis)		246,000	
b Worldwide assets		738,000	
3 Liabilities			
a U.S.-booked liabilities of partnership		315,558	
b Directly allocated partnership indebtedness		246,000	
4 Personnel			
a Personnel of U.S. trade or business		246,000	
b Worldwide personnel		246,000	
5 Gross receipts from sales or services by SIC code			
	(i) SIC code	(ii) ECI	(iii) Worldwide
a	18	294,874	0
b	100	388,077	492,394
6 Reserved for future use			
	(i)	(ii)	(iii)
a			
b			
7 Other allocation and apportionment key			
	(i) Key/Factor	(ii) Allocation	
a	WILL THIS PRINT ON THE K-3	513,448	
b	WILL THIS PRINT ON THE K-3	88,961,640	
8 Other allocation and apportionment key			
	(i) Key/Factor	(ii) Allocation	
a	WILL THIS PRINT ON THE K-3	133,794	
b	WILL THIS PRINT ON THE K-3	77,766	

Section 4—Reserved for Future Use

	Reserved	(a)	(b)	(c)
1	Reserved for future use			
2	Reserved for future use			
3	Reserved for future use			
4	Reserved for future use			
5	Reserved for future use			
6	Reserved for future use			
7	Reserved for future use			
8	Reserved for future use			
9	Reserved for future use			
10	Reserved for future use			

Name of partnership	EIN	Name of partner	SSN or TIN
K-3 ALL PARTS	99-9999999	173 - PWC ENTITY 173 - NAME LINE 2	APPLIED FOR

Part XI

Section 871(m) Covered Partnerships

- 1
- Box is checked if the partnership is a publicly traded partnership as defined in section 7704(b) and the partnership is a covered partnership as defined in Regulations section 1.871-15(m)(1) or directly or indirectly holds an interest in a lower-tier partnership that is a covered partnership
- ☐
- 2
- Number of units held by the partner: 0
- 3
- For each allocation period, see the following information for the number of units specified on line 2.

(i) Beginning of allocation period	(ii) End of allocation period	(iii) Dividends (enter four decimal places)	(iv) Dividend equivalents (enter four decimal places)	(v) Total (enter four decimal places)
		0	0	0
		0	0	0
		0	0	0
		0	0	0

Part XII

Reserved for future use

Part XIII

Foreign Partner's Distributive Share of Deemed Sale Items on Transfer of Partnership Interest

A	Date of transfer of the partnership interest	B1	Percentage interest in the partnership transferred	B2	Number of units in the partnership transferred	B3	Reserved for future use
	11302021		90		7500		

C Check if: 1 ☒ Capital 2 ☐ Preferred 3 ☒ Profits 4 ☐ Other

		Partner's Distributive Share
1	Total ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	1 807,000
2	Aggregate effectively connected ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	2 44,400
3	Aggregate effectively connected capital gain (loss) that would be recognized on the deemed sale of non-section 751 property	3 0
4	Gain (loss) that would be recognized under section 897(g) on the deemed sale of U.S. real property interests	4 0
5	Check this box if the amount provided on line 2 or 3 is determined (in whole or in part) under Regulations section 1.864(c)(8)-1(c)(2)(ii)(E) (material change in circumstances rule for a deemed sale of the partnership's inventory property or intangibles)	<input type="checkbox"/>
6	Reserved for future use	6
7	Reserved for future use	7
8	Reserved for future use	8

Name of partnership	EIN	Name of partner	SSN or TIN
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Part XI

Section 871(m) Covered Partnerships

- 1
- Box is checked if the partnership is a publicly traded partnership as defined in section 7704(b) and the partnership is a covered partnership as defined in Regulations section 1.871-15(m)(1) or directly or indirectly holds an interest in a lower-tier partnership that is a covered partnership
- ☐
- 2
- Number of units held by the partner: _____
- 3
- For each allocation period, see the following information for the number of units specified on line 2.

(i) Beginning of allocation period	(ii) End of allocation period	(iii) Dividends (enter four decimal places)	(iv) Dividend equivalents (enter four decimal places)	(v) Total (enter four decimal places)

Part XII

Reserved for future use

Part XIII

Foreign Partner's Distributive Share of Deemed Sale Items on Transfer of Partnership Interest

A	Date of transfer of the partnership interest	B1	Percentage interest in the partnership transferred	B2	Number of units in the partnership transferred	B3	Reserved for future use
	02062022		26.13		336699		

C

Check if:

1

☐

Capital

2

☐

Preferred

3

☐

Profits

4

☒

Other

		Partner's Distributive Share
1	Total ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	15,000
2	Aggregate effectively connected ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	4,800
3	Aggregate effectively connected capital gain (loss) that would be recognized on the deemed sale of non-section 751 property	4,600
4	Gain (loss) that would be recognized under section 897(g) on the deemed sale of U.S. real property interests	4,200
5	Check this box if the amount provided on line 2 or 3 is determined (in whole or in part) under Regulations section 1.864(c)(8)-1(c)(2)(ii)(E) (material change in circumstances rule for a deemed sale of the partnership's inventory property or intangibles)	
	<input type="checkbox"/>	
6	Reserved for future use	
7	Reserved for future use	
8	Reserved for future use	

Name of partnership	EIN	Name of partner	SSN or TIN
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Part XI

Section 871(m) Covered Partnerships

- 1
- Box is checked if the partnership is a publicly traded partnership as defined in section 7704(b) and the partnership is a covered partnership as defined in Regulations section 1.871-15(m)(1) or directly or indirectly holds an interest in a lower-tier partnership that is a covered partnership ☐
- 2
- Number of units held by the partner: _____
- 3
- For each allocation period, see the following information for the number of units specified on line 2.

(i) Beginning of allocation period	(ii) End of allocation period	(iii) Dividends (enter four decimal places)	(iv) Dividend equivalents (enter four decimal places)	(v) Total (enter four decimal places)

Part XII

Reserved for future use

Part XIII

Foreign Partner's Distributive Share of Deemed Sale Items on Transfer of Partnership Interest

A	Date of transfer of the partnership interest	B1	Percentage interest in the partnership transferred	B2	Number of units in the partnership transferred	B3	Reserved for future use
	06032022		63.633		36900		

C

Check if: 1 ☐ Capital 2 ☒ Preferred 3 ☐ Profits 4 ☐ Other

		Partner's Distributive Share
1	Total ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	1 108,000
2	Aggregate effectively connected ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	2 108,000
3	Aggregate effectively connected capital gain (loss) that would be recognized on the deemed sale of non-section 751 property	3 108,000
4	Gain (loss) that would be recognized under section 897(g) on the deemed sale of U.S. real property interests	4 108,000
5	Check this box if the amount provided on line 2 or 3 is determined (in whole or in part) under Regulations section 1.864(c)(8)-1(c)(2)(ii)(E) (material change in circumstances rule for a deemed sale of the partnership's inventory property or intangibles) <input type="checkbox"/>	
6	Reserved for future use	6
7	Reserved for future use	7
8	Reserved for future use	8

Name of partnership	EIN	Name of partner	SSN or TIN
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Part XI

Section 871(m) Covered Partnerships

- 1
- Box is checked if the partnership is a publicly traded partnership as defined in section 7704(b) and the partnership is a covered partnership as defined in Regulations section 1.871-15(m)(1) or directly or indirectly holds an interest in a lower-tier partnership that is a covered partnership
- ☐
- 2
- Number of units held by the partner: _____
- 3
- For each allocation period, see the following information for the number of units specified on line 2.

(i) Beginning of allocation period	(ii) End of allocation period	(iii) Dividends (enter four decimal places)	(iv) Dividend equivalents (enter four decimal places)	(v) Total (enter four decimal places)

Part XII

Reserved for future use

Part XIII

Foreign Partner's Distributive Share of Deemed Sale Items on Transfer of Partnership Interest

A	Date of transfer of the partnership interest	B1	Percentage interest in the partnership transferred	B2	Number of units in the partnership transferred	B3	Reserved for future use
	05012023		10.5656		0		

C

Check if:

1

☒

Capital

2

☐

Preferred

3

☐

Profits

4

☐

Other

		Partner's Distributive Share
1	Total ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	1 640,000
2	Aggregate effectively connected ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	2
3	Aggregate effectively connected capital gain (loss) that would be recognized on the deemed sale of non-section 751 property	3 463,800
4	Gain (loss) that would be recognized under section 897(g) on the deemed sale of U.S. real property interests	4 42,600
5	Check this box if the amount provided on line 2 or 3 is determined (in whole or in part) under Regulations section 1.864(c)(8)-1(c)(2)(ii)(E) (material change in circumstances rule for a deemed sale of the partnership's inventory property or intangibles)	<input type="checkbox"/>
6	Reserved for future use	6
7	Reserved for future use	7
8	Reserved for future use	8