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

Final K-3

OMB	Nο	1545-	0123
CIVID	INO.	1040-	0120

Amended K-3

2021

Department of the Treasury Internal Revenue Service For calendar year 2021, or tax year beginning ________, ending _______, ending _______

Information About the Partnership					Information About the Partner																	
Α	Partners	ship's employer identification number (EIN)	C Partner's SSN or Taxpayer Identification Number (TIN) (Do not use TIN of a disregarded entity. See instructions.)																			
APP	LIED F	OR	Δ	\PPI	LIE	DF	OR															
В	Partners	ship's name, address, city, state, and ZIP code	D) Na	ame	, add	dres	s, city	/, sta	ate, a	and Z	ZIP c	ode	for p	oartr	er e	ntere	ed in C	S. See ir	struct	ions.	
K-3 /	ALL PA	ARTS	1	73 -	- P\	NC	EN.	TITY	′ 17	1 - 8	NAN	1E L	INE	= 2								
123	COWB	OY WAY	1	73 I	RO	SS	AVE	ENU	E S	UIT	E 17	73										
DAL	LAS,			DALI	LAS	3, T	X 7	5201														
Е	Chec	ck to indicate the parts of Schedule K-3 that apply.																		Yes	No	=
	1	Does Part I apply? If "Yes," complete and attach Part I																	1		V	Ī
	2	Does Part II apply? If "Yes," complete and attach Part II .																	2	V		
	3	Does Part III apply? If "Yes," complete and attach Part III .																	3	~		Ī
	4	Does Part IV apply? If "Yes," complete and attach Part IV .																	4	~		Ī
	5	Does Part V apply? If "Yes," complete and attach Part V .																	5	V		Ī
	6	Does Part VI apply? If "Yes," complete and attach Part VI.																	6	V		1
	7	Does Part VII apply? If "Yes," complete and attach Part VII																	7	V		1
	8	Does Part VIII apply? If "Yes," complete and attach Part VIII																	8	V		1
	9	Does Part IX apply? If "Yes," complete and attach Part IX.																	9	V		1
	10	Does Part X apply? If "Yes," complete and attach Part X .																	10	V		1
	11	Does Part XI apply? If "Yes," complete and attach Part XI.																	11		~	1
	12	Reserved for future use																	12			
	13	Does Part XIII apply? If "Yes," complete and attach Part XIII																	13		~	l

ne of partnership	E	EIN	Name of par	tner		SSN or TIN	,	
3 ALL PARTS		APPLIED FOR	173 - PWC	LINE 2	APPLIED FOR			
Part I Partner's Share of Par	tnership's Othe	r Current Year Int						
eck box(es) for additional specified attachme	ents. See instructions.							
1. Gain on personal property sale	4. Foreign tax	translation	7. Form	8858 information	10). Partner loan transactio	ons	
2. Foreign oil and gas taxes	5. High-taxed	income	8. Form	5471 information	<u> </u>	. Dual consolidated loss	3	
3. Splitter arrangements		7A disallowed deduction 9. Other forms 12. Other international items (attach description and statem						
Part II Foreign Tax Credit Lin	nitation					· ·	, , , , , , , , , , , , , , , , , , ,	
Section 1—Gross Income			Foreign	Source				
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code901J)	(f) Sourced by partner	(g) Total	
1 Sales								
A EZ	100	200	400	300	500	0	1,500	
В	0	0	0	0	0	0	(
С	0	0	0	0	0	0	(
2 Gross income from performance of services								
Α	0	0	0	0	0	0	(
В	0	0	0	0	0	0	(
С	0	0	0	0	0	0	(
3 Gross rental real estate income								
Α	0	0	0	0	0	0	(
В	0	0	0	0	0	0	(
С	0	0	0	0	0	0	(
4 Other gross rental income								
Α	0	0	0	0	0	0	(
В	0	0	0	0	0	0	(
С	0	0	0	0	0	0	(
5 Guaranteed payments	0	0	0	0	0	0	(
6 Interest income								
Α	0	0	0	0	0	0		
В	0	0	0	0	0	0		
С	0	0	0	0	0	0	(

7 Ordinary dividends (exclude amount on line 8)

B C

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

Part II Foreign Tax Credit Limitation (continued)

·		Foreign Source (f) Sourced by									
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J	(f) Sourced by partner	(g) Total				
8 Qualified dividends											
A	0	0	0	0	0	0	(
В	0	0	0	0	0	0	1				
C	0	0	0	0	0	0					
9 Reserved for future use											
10 Royalties and license fees											
Α	0	0	0	0	0	0					
В	0	0	0	0	0	0					
c	0	0	0	0	0	0					
11 Net short-term capital gain											
Α	0	0	0	0	0	0					
В	0	0	0	0	0	0					
c	0	0	0	0	0	0					
12 Net long-term capital gain											
A	0	0	0	0	0	0					
В	0	0	0	0	0	0					
c	0	0	0	0	0	0					
13 Collectibles (28%) gain											
Α	0	0	0	0	0	0					
В	0	0	0	0	0	0					
c	0	0	0	0	0	0					
14 Unrecaptured section 1250 gain											
Α	0	0	0	0	0	0					
В	0	0	0	0	0	0					
c	0	0	0	0	0	0					
15 Net section 1231 gain											
A	0	0	0	0	0	0					
В	0	0	0	0	0	0	1				
	0	0	0	0	0	0	(

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

Foreign Tax Credit Limitation (continued) Part II

			Foreign	Source		(f) Coursed by		
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)	(f) Sourced by partner	(g) Total	
16 Section 986(c) gain	0	0	0	0	0	0	0	
17 Section 987 gain	0	0	0	0	0	0	0	
18 Section 988 gain	0	0	0	0	0	0	0	
19 Section 951(a) inclusions								
Α	0	0	0	0	0	0	0	
В	0	0	0	0	0	0	0	
С	0	0	0	0	0	0	0	
20 Other income (see instructions)								
Α	0	0	0	0		0	0	
В	0	0	0	0	0	0	0	
С	0	0	0	0	0	0	0	
21 Reserved for future use								
Α								
В								
С								
22 Reserved for future use								
Α								
В								
C								
23 Reserved for future use								
Α								
В								
C								
24 Total gross income (combine lines 1								
through 23) ▶	100	200	400	300	500	0	1,500	
A EZ	100	200	400	300	500	0	1,500	
В	0	0	0	0	0	0	0	
C	0	0	0	0	0	0	0	

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

Part II Foreign Tax Credit Limitation (continued)

Section 2—Deductions

				Foreign	Source		(0.0	
	Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)	(f) Sourced by partner	(g) Total
25	Expenses allocable to sales income .	(100)	(200)	0	(300)	0	0	(600)
26	Expenses allocable to gross income							
	from performances of services	0	0	0	0	0	0	C
27	Net short-term capital loss	0	0	0	0	0	0	0
28	Net long-term capital loss	0	0	0	0	0	0	C
29	Collectibles loss	0	0	0	0	0	0	C
30	Net section 1231 loss	0	0	0	0	0	0	C
31	Other losses	0	0	0	0	0	0	C
32	Research & experimental (R&E) expenses							
A	SIC code						0	C
E	SIC code						0	C
C	SIC code						0	C
33	Allocable rental expenses—							
	depreciation, depletion, and amortization	0	0	0	0	0	0	C
34	Allocable rental expenses—other than							
	depreciation, depletion, and amortization	0	0	0	0	0	0	(
35	Allocable royalty and licensing							
	expenses—depreciation, depletion,							
	and amortization	0	0	0	0	0	0	C
36	Allocable royalty and licensing							
	expenses—other than depreciation,							
	depletion, and amortization	0	0	0	0	0	0	C
37	Depreciation not included on line 33							
	or 35	0	0	0	0	0	0	C
38	Charitable contributions	0						C
39	Interest expense specifically allocable							
	under Regulations section 1.861-10(e)	0	0	0	0	0	0	C
40	Other interest expense specifically							
	allocable under Regulations section							
	1.861-10T	0	0	0	0	0	0	C
41	Other interest expense—business .						0	C
42	Other interest expense—investment .						0	C
43	Other interest expense—passive activity						0	C
44	Section 59(e)(2) expenditures,							
	excluding R&E expenses on line 32 .	0	0	0	0	0	0	C
45	Foreign taxes not creditable but							
	deductible	0	0	0	0	0	0	(

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

Part II Foreign Tax Credit Limitation (continued)

Section 2—Deductions (continued)

				Foreign	Source		(n o)	
	Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code 901J)	(f) Sourced by partner	(g) Total
46	Section 986(c) loss	0	0	0	0	0	0	0
47	Section 987 loss	0	0	0	0	0	0	0
48	Section 988 loss	0	0	0	0	0	0	0
49	Other allocable deductions (see instructions)	0	0	0	0	0	0	0
50	Other apportioned share of deductions (see instructions)	0	0	0	0	0	0	0
51	Reserved for future use							
52	Reserved for future use							
53	Reserved for future use							
54	Total deductions (combine lines 25 through 53) ▶	(100)	(200)	0	(300)	0	0	(600)
55	Net income (loss) (subtract line 54 from line 24) ▶	200	400	400	600	500	0	2,100

Part III Other Information for Preparation of Form 1116 or 1118

Section 1—R&E Expenses Apportionment Factors

				Foreign	Source				
Description		(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code) (country code)	(f) Sourced by partner	(g) Total	
1	Gross receipts by SIC code								
Α	SIC code 100	100	200	0	0	0	0	300	
В	SIC code 0	0	0	0	0	0	0	0	
С	SIC code 0	0	0	0	0	0	0	0	
D	SIC code 0	0	0	0	0	0	0	0	
E	SIC code 0	0	0	0	0	0	0	0	
F	SIC code 0	0	0	0	0	0	0	0	
2	Exclusive apportionment	t with respect to total R8	E expenses entered on	Part II, line 32. Enter the	following.				
Α	R&E expense with respe	ct to activity performed	n the United States						

2	Exclusive apportionment with respect to total R&E expenses entered on Part II, line 32. Enter the following.			
Α	A R&E expense with respect to activity performed in the United States			
	(i) SIC code 0		2A(i)	(
	(ii) SIC code 0		2A(ii)	(
	(iii) SIC code 0		2A(iii)	(
В	B R&E expense with respect to activity performed outside the United States			
	(i) SIC code 0		2B(i)	(
	(ii) SIC code 0		2B(ii)	(
	(iii) SIC code 0		2B(iii)	(

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

Part III Other Information for Preparation of Form 1116 or 1118 (continued)

Section 2—Interest Expense Apportionment Factors

			Foreign	Source				
Description	(a) U.S. source	(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code) (country code)	(f) Sourced by partner	(g) Total	
1 Total average value of assets	100	200	500	300	600	700	2,400	
2 Sections 734(b) and 743(b) adjustment to assets—average value .	0	0	0	0	0	0	0	
3 Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)	0	0	0	0	0	0	0	
Other assets attracting directly allocable interest expense under Regulations section 1.861-10T	0	0	0	0	0	0	0	
5 Assets excluded from apportionment formula	0	0	0	0	0	0	0	
6a Total assets used for apportionment (subtract the sum of lines 3, 4, and 5 from the sum of lines 1 and 2)	0	0	0	0	0	0	0	
b Assets attracting business interest expense	0	0	0	0	0	0	0	
c Assets attracting investment interest expense	0	0	0	0	0	0	0	
d Assets attracting passive activity interest expense	0	0	0	0	0	0	0	
7 Basis in stock of 10%-owned noncontrolled foreign corporations (see attachment)	0	0	0	0	0	0	0	
8 Basis in stock of CFCs (see attachment)	0	0	0	0	0	0	0	

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

				Foreign Source				
Description		(a) U.S. source (b) Passive category income		(c) General category income	(d) Other (category code) (country code)	(e) Sourced by partner	(f) Total	
1	Foreign-derived gross receipts	0	0	0	0	0	0	
2	Cost of goods sold	0	0	0	0	0	0	
3	Partnership deductions allocable to foreign-derived gross receipts	0	0	0	0	0	0	
4	Other partnership deductions apportioned to foreign-derived gross receipts	0	0	0	0	0	0	

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

Part III Other Information for Preparation of Form 1116 or 1118 (continued)

Section 4—Foreign Taxes

Description	(a) Type of tax	(b) Section 951A ca	ategory income	(c) Fore	eign branch category inco	me
Description	(a) Type of tax	U.S.	Foreign	U.S.	Foreign	Partner
1 Direct (section 901 or						
903) foreign taxes: Paid Accrued	NA/LITE	(450)				
A AL	WHTD	(150)	0	0	0	
В		0	0	0	0	
<u>c</u>		0	0	0	0	
D		0	0	0	0	
E		0	0	0	0	
F		0	0	0	0	
2 Reduction of taxes (total)						
A Taxes on foreign mineral income		0	0	0	0	
B Reserved for future use						
C International boycott provisions		0	0	0	0	
D Failure-to-file penalties		0	0	0	0	
E Taxes with respect to splitter arrangements		0	0	0	0	
F Taxes on foreign corporate distributions		0	0	0	0	
G Other		0	0	0	0	
3 Foreign tax redeterminations						
A GT						
Related tax year ►2021						
Date tax paid ► 11/03/2021	WHTP	0	(4,000)	0	0	
R HA						
Related tax year ► 2021						
Date tax paid ► 11/01/2021	WHTP	(3,000)	0	0	0	
С						
Related tax year ►						
Date tax paid ►		0	0	0	0	
4 Reserved for future use						
5 Reserved for future use						
6 Reserved for future use						

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

Part III Other Information for Preparation of Form 1116 or 1118 (continued)

Section 4—Foreign Taxes (continued)

	(d)	Passive category incon	ne	(e) General category incor	ne	(f) Other	(a) Total	
	U.S.	Foreign	Foreign Partner		Foreign	Partner	(category code)	(g) Total	
1									
Α	0	0	0	0	0	0	0	(150)	
В	0	0	0	0	0	0	0	0	
С	0	0	0	0	0	0	0	0	
D	0	0	0	0	0	0	0	0	
E	0	0	0	0	0	0	0	0	
F	0	0	0	0	0	0	0	0	
2									
Α	0	0	0	0	0	0	0	0	
В									
С	0	0	0	0	0	0	0	0	
D	0	0	0	0	0	0	0	0	
E	0	0	0	0	0	0	0	0	
F	0	0	0	0	0	0	0	0	
G	0	0	0	0	0	0	0	0	
3									
Α	0	0	0	0	0	0	0	(4,000)	
В	0	0	0	0	0	0	0	(3,000)	
	0	0	0	0	0	0	0	0	
4									
5									
6									

Section 5—Other Tax Information

					Foreign Source					
	Description	(a) U.S. source	(b) Section 951A category income			(e) General category income	' / / / / / / / / / / / / / / / / / / /		(h) Total	
1	Section 743(b) positive income adjustment .	0	0	0	0	0	0	0	0	
2	Section 743(b) negative income adjustment .	0	0	0	0	0	0	0	0	
3	Reserved for future use									
4	Reserved for future use									

Name	of partnership	EIN	Name of partner		SSN	N or TIN	_
K-3 A	ALL PARTS	APPLIED FOR	173 - PWC ENTITY	173 - NAME LINE 2	AP	PLIED FOR	
Pa	art IV Information on Partner's Section 250	Deduction With Respe	ect to Foreign-Deriv	ed Intangible Incom	e (FDII)		
Se	ction 1—Information To Determine Deduction E	Eligible Income (DEI) ar	nd Qualified Busines	ss Asset Investment	(QBAI) on Form 8	3993	
1	Net income (loss)					1 1,	,000
2a	DEI gross receipts					2a	(
b	DEI cost of goods sold (COGS)					2b	(
С	DEI properly allocated and apportioned deductions					2c	(
3	Section 951(a) inclusions					3	(
4	CFC dividends					4	(
5	Financial services income					5	(
6	Domestic oil and gas extraction income					6	(
7	Foreign branch income					7	(
8	Partnership QBAI					8	(
Se	ction 2—Information To Determine Foreign-De	rived Deduction Eligible	e Income on Form 8	3993 (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		0	0		0	(
	COGS		0	0		0	(
11	Allocable deductions		0	0		0	
12	Other apportioned deductions					12	-
	ction 3—Other Information for Preparation of F						
				DEI	FDDEI	Total	
						Total	
13	Interest deductions	orm 8993		DEI		0 (2,0)00
13 A	ction 3—Other Information for Preparation of F Interest deductions	tion 1.861-10(e)		DEI (2,000))000
13 A B	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation	tion 1.861-10(e)		DEI (2,000)		0 (2,0)00
13 A B C	Interest deductions Interest expense specifically allocable under Regulations Sec Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0		0 (2,0)000
13 A B C	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0		0 (2,0	000
13 A B C	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0		0 (2,0)000
13 A B C 14 A B	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0 0 0 0		0 (2,0	0000
13 A B C 14 A B C	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0 0 0 0 0 0 0		0 (2,0 0 0 0 0 0 0	0000
13 A B C 14 A B C D	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0 0 0 0 0 0 0 0 0 0		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0000
13 A B C 14 A B C D	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0 0 0 0 0 0 0 0 0 0		0 (2,0 0 0 0 0 0 0	0000
13 A B C 14 A B C D E F	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0 0 0 0 0 0 0 0 0 0		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0000
13 A B C 14 A B C D E F F	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		(2,000) 0 0 0 0 0 0 0 0 0 0 0		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
13 A B C 14 A B C D E F F	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		0 (2,000) 0 0 0 0 0 0 0 0 0 0 5,000		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0000,0000
13 A B C 14 A B C D E F 15 A B	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		0 (2,000) 0 0 0 0 0 0 0 0 0 0 5,000		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
13 A B C 14 A B C D E F 15 A B C C	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		0 (2,000) 0 0 0 0 0 0 0 0 0 0 5,000		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
13 A B C 14 A B C D E F 15 A B C 16	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		0 (2,000) 0 0 0 0 0 0 0 0 0 0 5,000	FDDEI	0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
13 A B C 14 A B C D E F 15 A B C 16 A	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		0 (2,000) 0 0 0 0 0 0 0 0 0 0 5,000		0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
13 A B C 14 A B C D E F 15 A B C 16 A B	Interest deductions Interest expense specifically allocable under Regulations sec Other interest expense specifically allocable under Regulation Other interest expense specifically allocable under Regulation Other interest expense	tion 1.861-10(e)		0 (2,000) 0 0 0 0 0 0 0 0 0 0 5,000	FDDEI	0 (2,0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	

Name	of partnership	EIN		N	lame of par	tner		SSN or TIN		
K-3 A	LL PARTS	APF	PLIED FOR	1	173 - PWC	ENTITY 173 - NAME LI	NE 2		APPLIED FOR	
Pa	art V Distributions Fi	rom Foreign Corporations	s to Partnersh	hip				·		
	(a) Name of	distributing foreign corporation		(b) EIN reference ID		(c) Date of distribution	(d) Functiona distributing fore	currency of gn corporation	(e) Amount of distribution in functional currency	
Α	FOREIGN CORP A			98-1295467		11/04/2021		BRL	1,000	
В									(
С									(
D										
Е										
F										
G										
Н										
I									(
J									(
K									(
L									(
M									(
N									(
0									(
	(f) Amount of E&P distribution in functional currency	(g) Spot rate (functional currency to U.S. dollars)		of distribution (i) A		ount of E&P distribution in U.S. dollars	(j) Qualified foreign corporation		(k) Reserved for future use	
Α	0	1		1,000)	0	~	7		
В	0	0		0)	0				
С	0	0		0)	0				
D	0	0		0	_	0				
E	0	0		0	_	0				
F	0	0		0		0				
G	0	0		0		0				
_н	0	0	_	0		0				
<u> </u>	0	0		0		0	L	<u> </u>		
J	0	0		0		0		<u> </u>		
K	0	0		0	_	0	L	<u> </u>		
_ <u>L</u>	0	0		0	_	0	<u> </u>	1		
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<u>N</u>	0	0		0		0	<u> </u>	1		
0	0	0		0)	0		J		

Name	of partnership			EIN			Name of partner				SSN or	TIN
K-3 A	LL PARTS			APP	LIED FOR		173 - PWC EN	ITITY 1	173 - NAME LINE 2		APPLI	ED FOR
Pa	art VI Information	n on Partner's	Section	n 951(a)(1) and Sectio	n 951 <i>i</i>	A Inclusions				·	
а	Separate category (enter c	ode)									<u>P</u>	AS
b	If box is checked, this is co	ompleted with res	pect to U.S	S. source inc	ome					<u> </u>		▶ □
	(a) Name of			r (c) Ending of CFC CF		CFC items throug	d) Partner's share of FC items through its ownership in the partnership			ner's section)(B) inclusion	(g) Tested income	
Α	FOREIGN CORP A		98-12954	295467 01010001				2,000	3,0	100	0	100
	TORLION CORT 7		30 1230	101	0101000	•		0	0,0	0	0	(
C								0		0	0	(
D								0		0	0	(
Е								0		0	0	(
F								0		0	0	(
G								0		0	0	(
Н								0		0	0	(
ı								0		0	0	(
J								0		0	0	(
K								0		0	0	(
1	Partner's total (sum for a	all CFCs)				<u></u>		<u> </u>	3,0	000	0	100
	(h) Tested loss		tested income tested loss		Qualifi	Partner's share of ed Business Asset estment (QBAI)	I Business Asset the tested loss		(m) Partner' tested intere		(n) Partner's share of tested interest expense	
Α	200		0		0		0		0		0	(
В												
С												
D												
<u>E</u>												
F												
G												
<u> </u>												
J												
K												
1	200		0		0		0		0		0	(
-	200	i e				1	•	1	•		-	

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

N-3 ALL PARTS	1	APPLIED FOR		1/3 - PWC ENTITY	1/3 - NAIVIE LI	IINE Z		APPLIED	-UK	
Part VII Information To Com				1			'			
Section 1—General Information of	n Passive Foreign	Investment Com	pany	(PFIC), Qualified Ele	ecting Fund	d (QEF), or Q	ualifying Ins	surance (Corpo	oration (QIC)
			Gener	al Information						
(a) Name of PFIC		(b) EIN or reference ID number					(d) Beginning of PFIC tax year		(e) Ending of PFIC tax year	
PFIC A		11-1111111	PFIC	A ADDRESS			010120	21		12312021
	Summary of Annual Int	formation				Informa	tion Regardin	g Elections	;	
(g) Dates PFIC shares acquired during tax year (if applicable)		(h) Partner's shar total number o PFIC shares held partnership at end tax year	che for		(k) Box is checked if foreign corporation has documented its eligibility to be treated as a qualifying insurance corporation under section 1297(f)(2).	(I) Box is checked if PFIC has indicated its shares are "marketable stock" within the meaning of section 1296(e).	FIC checked ed PFIC is als are a controlle le foreign corporation g (CFC) with		(n) Box is checked if PFIC meets the income test or asset test of section 1297(a) for the tax year.	
СОМ			1,500	2,500						
			0	0		닏		 		\vdash \vdash
			0	0			\vdash	+ $+$		
			0	0		<u> </u>	\vdash	<u> </u>		\vdash
			0	0		片片	 	╁┈┼╡		
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			0	0		 		╅		
			0	0		片片		╅		
			0	0				$+$ \vdash		

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 Name of partnership
 EIN
 Name of partner
 SSN or TIN

 K-3 ALL PARTS
 APPLIED FOR
 173 - PWC ENTITY 173 - NAME LINE 2
 APPLIED FOR

Part VII Information To Complete Form 8621 (continued)

Section 2—Additional Information on PFIC or QEF

General Inform	ation	QEF Info	ormation	Mark-to-Mark	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
PFIC A	11-1111111	0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	
		0	0	0	0	

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	(I) 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)	l diamonitian hu
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0
0		0	0		0	0	0

Name of partnership	EIN	Name of partner	S	SSN or TIN				
K-3 ALL PARTS	APPLIED FOR	173 - PWC EN	173 - PWC ENTITY 173 - NAME LINE 2 APPLIED FOR					
Part VIII Partner's Interest in Foreign Corpo	ration Income (Sect	ion 960)		<u>.</u>				
A EIN or reference ID number of controlled foreign corporation	on CFC A ID	B Separat	e category. See instructions	GEN				
c If PAS was entered on line B, applicable grouping under R	egulations 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 in	structions						
E Box is checked if U.S. source income					▶□			
F Box is checked if FORI or FOGEI					▶□			
Amounts are in functional currency unless otherwise noted	l.	(i) Country code	(ii) Partner's share	(iii) Partner's share of	(iv) Reserved for			
See instructions.		(i) Country code	of net income	average asset value	future use			
1 Subpart F income groups								
a Dividends, interest, rents, royalties, and annuities (total)			1,000					
(1) Unit UNIT A		BR	1,000					
(2) Unit			0					
b Net gain from certain property transactions (total)			0					
(1) Unit			0					
(2) Unit			0					
c Net gain from commodities transactions (total)			0					
(1) Unit			0					
(2) Unit			0					
d Net foreign currency gain (total)			0					
(1) Unit			0					
(2) Unit			0					
e Income equivalent to interest (total)			0					
(1) Unit			0					
(2) Unit								
f Foreign base company sales income (total)			0					
(1) Unit								
(2) Unit								
g Foreign base company services income (total)			0					
(1) Unit								
(2) Unit								
h Full inclusion foreign base company income (total) .			0					
(1) Unit								
(2) Unit								
i Insurance income (total)			0					
(1) Unit								
(2) Unit								
j International boycott income (total)			0					
k Bribes, kickbacks, and other payments (total)			0					
I Section 901(j) (total)			0					

Name o	of partnership	IN	Name of partner	SSN	or TIN	
K-3 AL	LL PARTS	APPLIED FOR	173 - PWC EN	TITY 173 - NAME LINE 2	APF	LIED FOR
Par	t VIII Partner's Interest in Foreign Corporati	on Income (Sec	tion 960) (continued)			
	Amounts are in functional currency unless otherwise noted. See instructions.		(i) Country code	(ii) Partner's share of net income	(iii) Partner's share of average asset value	(iv) Reserved for future use
2	Recaptured subpart F income			0		
	Tested income group (total)			0		
	(1) Unit			0		
	(2) Unit			0		
4	Residual income group (total)					
	(1) Unit			0		
	(2) Unit			0		
	Total		BR	1,000		
	rt IX Partner's Information for Base Erosion	n and Anti-Abuse	e Tax (Section 59A)			
Sec	tion 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)			1,500	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 per 1.59A-2(e)(3)	ŭ	ū	0		
Sec	tion 2—Base Erosion Payments and Base Erosi			- 1		ı
	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 (pater			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 s	ection 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 in	surance and reinsura	nce 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 lir section 871 or 881, with respect to which tax has been withh (0.30) statutory withholding tax rate	eld under section 144	41 or 1442 at the 30%			0

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

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			
19	Total base erosion tax benefits (subtract the sum of lines 17 and 18 from the sum of lines 8 through 16).			
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

				Pai	rtnership Determinati	on		
Description	(a) Total	(b) Partner	E	CI		Non-ECI		
Description	(a) Total	determination	(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)	10,000	10,000	0	0	0	0	(
2 Gross rental real estate income	15,000	0	0	0	15,000	0	(
3 Other gross rental income	0	0	0	0	0	0	(
4 Guaranteed payments for services .	0	0	0	0	0	0	(
5 Guaranteed payments for use of capital	0	0	0	0	0	0	(
6 Interest income	0	0	0	0	0	0	(
7 Dividends	0	0	0	0	0	0	(
8 Dividend equivalents	0	0	0	0	0	0	(
9 Royalties and license fees	0	0	0	0	0	0	(
10 Net short-term capital gain	0	0	0	0	0	0	(
11 Net long-term capital gain	0	0	0	0	0	0	(
12 Collectibles (28%) gain	0	0	0	0	0	0	(
13 Unrecaptured section 1250 gain	0	0	0	0	0	0	(
14 Net section 1231 gain	0	0	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	0	0	0	0	0	0	(
21 Gross income (sum of lines 1						_		
through 20) ▶	25,000	10,000	0	0	15,000	0	(

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

Foreign Partner's Character and Source of Income and Deductions (continued)

					Par	tnership Determinati	on	
	Description	(a) Tatal	(b) Partner	E	CI		Non-ECI	
	Description	(a) Total	determination	(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)	(3,500)	0	0	0	(3,500)	0	(3,500
2	Research and experimental expenses	0	0	0	0	0	0	
3	Expenses from rental real estate	0	0	0	0	0	0	
4	Expenses from other rental activities .	0	0	0	0	0	0	
5	Royalty and licensing expenses	0	0	0	0	0	0	
6	Section 179 deduction	0	0	0	0	0	0	
7	Interest expense on U.Sbooked							
	liabilities	0	0	0	0	0	0	
8	Interest expense directly allocable under Regulations sections							
	1.882-5(a)(1)(ii)(B) and 1.861-10T	0	0	0	0	0	0	
9	Other interest expense	0	0	0	0	0	0	
10	Section 59(e)(2) expenditures	0	0	0	0	0	0	
11	Net short-term capital loss	0	0	0	0	0	0	
12	Net long-term capital loss	0	0	0	0	0	0	
13	Collectibles loss	0	0	0	0	0	0	
14	Net section 1231 loss	0	0	0	0	0	0	
15	Other losses	0	0	0	0	0	0	
		0	0	0	0	0	0	
		0	0	0	0	0	0	
16	Charitable contributions	0		0				
17	Other ►	0	0	0	0	0	0	
18	Other ►	0	0	0	0	0	0	
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)	(3,500)	0	0	0	(3,500)	0	(3,500
25	Net income (loss) (line 21 (Section 1) minus line 24 (Section 2)) ▶	28.500				(=,===)	,	(2,000

	(i ago i o
Name o	f partnership		EIN	Name	of partner			SSN or TIN	-
K-3 AL	L PARTS		APPLIED FOR	173 -	PWC ENTITY	173 - NAME LINE 2		APPLIED FOR	
Pa	rt X Forei	ign Partner's Character and So	ource of Income and Deduc	tions	(continued)				
Sect	tion 3—Alloca	ition and Apportionment Metho	ods for Deductions						
1	Gross income			6	Reserved for	future use			
а	Gross ECI		4,500		(i)	(ii)		(iii)	
b	Worldwide gross	s income	25,000	а					
				b					
2	Assets								
а	Average U.S. ass	sets (inside basis)	0	7	Other allocat	on and apportionment	key		
b	Worldwide asset	ts	0			(i) Key/Factor		(ii) Allocation	n
				а					0
3	Liabilities			b					C
а		oilities of partnership							
b	Directly allocated	d partnership indebtedness	0	8	Other allocat	on and apportionment	key	1	
						(i) Key/Factor		(ii) Allocation	n
4	Personnel			а					C
а									C
b	Worldwide perso	onnel	0						
5		rom sales or services by SIC code							
	(i) SIC code	(ii) ECI	(iii) Worldwide						
а	100	7,777	8,888						
b		0	0						
Sect	tion 4-Reserv	ved for Future Use							
		Reserv	red			(a)	(b)	(c)	
1	Reserved for futu	ure use							
2		ure use							
3	Reserved for futu	ure use							
4	Reserved for futu	ure use							
5		ure use							
6		ure use							
7		ure use							
8	Reserved for futu	ure use							
9		ure use							
10	Reserved for futu	ure use							

Part II, Section 2 - Deductions by Country

		Foreign Source							
Description	(a) U.S. Source	(b) Foreign Branch Category Income	(c) Passive Category Income	(d) General Category Income	(e) Other Category Code:	(f) Sourced by Partner	(g) Total		
25. Expenses allocable to sales income									
	(100)	(200)	0	(300)	0	0	(600)		

Attachment for Part IX, Section 2, Line 11 - Worksheet A - Interest Paid or Accrued by the Partnership							
	(a)	(b)	(c)				
	Total Interest Paid or Accrued in the Current Year	Interest Paid or Accrued to Foreign Related Parties of the Foreign Partner in the Current Year	Interest Expense Paid or Accrued to Foreign Related Parties of the Foreign Partner That is Allowed as a Deduction in the Current Year				
(1) Interest Expense on Liabilities Described in							
Regulations section 1.882-5(A)(1)(ii)(A) or (B)							
(Direct Allocations)	3,000	950	750				
(2) Interest Paid on U.S. Booked Liabilities							
under Regulations section 1.882-5(d)(2)(vii)	4,000	850	550				
(3) Interest Paid on all Other Liabilities of the							
Partnership	800	850	250				
Totals. Combine line (1) through line (3)	7,800	2,650	1,550				

Part 10 - Partner Determination Detail		ECI		Non-ECI		
Description	Partner Deterimination	(c) U.S. Source	(d) Foreign Source	(e) U.S. Source (FDAP)	(f) U.S. Source (Other)	(g) Foreign Source
21. Gross income	10,000					
- If US Sourced		10,000		0	0	
- If Foreign Sourced			10,000			0
1. Ordinary business			·			
income gross	10,000					
- If US Sourced		10,000		0	0	
- If Foreign Sourced			10,000			0