

**Schedule K-3
(Form 1065)**

Department of the Treasury
Internal Revenue Service

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

For calendar year 2021, or tax year beginning 2021, ending _____
▶ See separate instructions.

☐ Final K-3

☐ Amended K-3

OMB No. 1545-0123

2021

Information About the Partnership

Information About the Partner

A Partnership's employer identification number (EIN)

C Partner's SSN or Taxpayer Identification Number (TIN) (Do not use TIN of a disregarded entity. See instructions.)

APPLIED FOR

APPLIED FOR

B Partnership's name, address, city, state, and ZIP code

D Name, address, city, state, and ZIP code for partner entered in C. See instructions.

K-3 ALL PARTS
123 COWBOY WAY
DALLAS,

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 type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

For IRS Use Only

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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.

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

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 <u>901J</u>)		
1 Sales							
A EZ	100	200	400	300	500	0	1,500
B	0	0	0	0	0	0	0
C	0	0	0	0	0	0	0
2 Gross income from performance of services							
A	0	0	0	0	0	0	0
B	0	0	0	0	0	0	0
C	0	0	0	0	0	0	0
3 Gross rental real estate income							
A	0	0	0	0	0	0	0
B	0	0	0	0	0	0	0
C	0	0	0	0	0	0	0
4 Other gross rental income							
A	0	0	0	0	0	0	0
B	0	0	0	0	0	0	0
C	0	0	0	0	0	0	0
5 Guaranteed payments	0	0	0	0	0	0	0
6 Interest income							
A	0	0	0	0	0	0	0
B	0	0	0	0	0	0	0
C	0	0	0	0	0	0	0
7 Ordinary dividends (exclude amount on line 8)							
A	0	0	0	0	0	0	0
B	0	0	0	0	0	0	0
C	0	0	0	0	0	0	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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 _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
9 Reserved for future use							
10 Royalties and license fees							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
11 Net short-term capital gain							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
12 Net long-term capital gain							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
13 Collectibles (28%) gain							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
14 Unrecaptured section 1250 gain							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
15 Net section 1231 gain							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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	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							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
20 Other income (see instructions)							
A _____	0	0	0	0	0	0	0
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0
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) ▶	100	200	400	300	500	0	1,500
A EZ	100	200	400	300	500	0	1,500
B _____	0	0	0	0	0	0	0
C _____	0	0	0	0	0	0	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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	(100)	(200)	0	(300)	0	0	(600)
26 Expenses allocable to gross income from performances of services	0	0	0	0	0	0	0
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	0
29 Collectibles loss	0	0	0	0	0	0	0
30 Net section 1231 loss	0	0	0	0	0	0	0
31 Other losses	0	0	0	0	0	0	0
32 Research & experimental (R&E) expenses							
A SIC code						0	0
B SIC code						0	0
C SIC code						0	0
33 Allocable rental expenses—depreciation, depletion, and amortization	0	0	0	0	0	0	0
34 Allocable rental expenses—other than depreciation, depletion, and amortization	0	0	0	0	0	0	0
35 Allocable royalty and licensing expenses—depreciation, depletion, and amortization	0	0	0	0	0	0	0
36 Allocable royalty and licensing expenses—other than depreciation, depletion, and amortization	0	0	0	0	0	0	0
37 Depreciation not included on line 33 or 35	0	0	0	0	0	0	0
38 Charitable contributions	0						0
39 Interest expense specifically allocable under Regulations section 1.861-10(e)	0	0	0	0	0	0	0
40 Other interest expense specifically allocable under Regulations section 1.861-10T	0	0	0	0	0	0	0
41 Other interest expense—business						0	0
42 Other interest expense—investment						0	0
43 Other interest expense—passive activity						0	0
44 Section 59(e)(2) expenditures, excluding R&E expenses on line 32	0	0	0	0	0	0	0
45 Foreign taxes not creditable but deductible	0	0	0	0	0	0	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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	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**

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 100	100	200	0	0	0	0	300
B SIC code 0	0	0	0	0	0	0	0
C 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 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 0 ▶						2A(i)	0
(ii) SIC code 0 ▶						2A(ii)	0
(iii) SIC code 0 ▶						2A(iii)	0
B R&E expense with respect to activity performed outside the United States							
(i) SIC code 0 ▶						2B(i)	0
(ii) SIC code 0 ▶						2B(ii)	0
(iii) SIC code 0 ▶						2B(iii)	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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	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
4 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

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	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 K-3 ALL PARTS	EIN APPLIED FOR	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	(150)	0	0	0	0
B		0	0	0	0	0
C		0	0	0	0	0
D		0	0	0	0	0
E		0	0	0	0	0
F		0	0	0	0	0
2 Reduction of taxes (total)						
A Taxes on foreign mineral income		0	0	0	0	0
B Reserved for future use						
C International boycott provisions		0	0	0	0	0
D Failure-to-file penalties		0	0	0	0	0
E Taxes with respect to splitter arrangements . .		0	0	0	0	0
F Taxes on foreign corporate distributions . . .		0	0	0	0	0
G Other		0	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	0
B HA						
Related tax year ► 2021						
Date tax paid ► 11/01/2021	WHTP	(3,000)	0	0	0	0
C						
Related tax year ►						
Date tax paid ►		0	0	0	0	0
4 Reserved for future use						
5 Reserved for future use						
6 Reserved for future use						

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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	0	0	0	0	0	0	0	(150)
B	0	0	0	0	0	0	0	0
C	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								
A	0	0	0	0	0	0	0	0
B								
C	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								
A	0	0	0	0	0	0	0	(4,000)
B	0	0	0	0	0	0	0	(3,000)
C	0	0	0	0	0	0	0	0
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 .	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 K-3 ALL PARTS	EIN APPLIED FOR	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	1,000
2a DEI gross receipts	2a	0
b DEI cost of goods sold (COGS)	2b	0
c DEI properly allocated and apportioned deductions	2c	0
3 Section 951(a) inclusions	3	0
4 CFC dividends	4	0
5 Financial services income	5	0
6 Domestic oil and gas extraction income	6	0
7 Foreign branch income	7	0
8 Partnership QBAI	8	0

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	0	0	0	0
10 COGS	0	0	0	0
11 Allocable deductions	0	0	0	0
12 Other apportioned deductions				12 0

Section 3—Other Information for Preparation of Form 8993

	DEI	FDDEI	Total
13 Interest deductions			
A Interest expense specifically allocable under Regulations section 1.861-10(e)	(2,000)	0	(2,000)
B Other interest expense specifically allocable under Regulations section 1.861-10T	0	0	0
C Other interest expense			0
14 Interest expense apportionment factors			
A Total average value of assets	0	0	0
B Sections 734(b) and 743(b) adjustment to assets—average value	0	0	0
C Assets attracting directly allocable interest expense under Regulations section 1.861-10(e)	0	0	0
D Other assets attracting directly allocable interest expense under Regulations section 1.861-10T	0	0	0
E Assets excluded from apportionment formula	0	0	0
F Total assets used for apportionment (the sum of lines 14C, 14D, and 14E subtracted from the sum of lines 14A and 14B)	0	0	0
R&E expenses apportionment factors			
15 Gross receipts by SIC code			
A SIC code 100	5,000	0	5,000
B SIC code 0	0	0	0
C SIC code 0	0	0	0
16 R&E expenses by SIC code			
A SIC code 0		16A	0
B SIC code 0		16B	0
C SIC code 0		16C	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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	11/04/2021	BRL	1,000
B					0
C					0
D					0
E					0
F					0
G					0
H					0
I					0
J					0
K					0
L					0
M					0
N					0
O					0

	(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	1,000	0	<input checked="" type="checkbox"/>	
B	0	0	0	0	<input type="checkbox"/>	
C	0	0	0	0	<input type="checkbox"/>	
D	0	0	0	0	<input type="checkbox"/>	
E	0	0	0	0	<input type="checkbox"/>	
F	0	0	0	0	<input type="checkbox"/>	
G	0	0	0	0	<input type="checkbox"/>	
H	0	0	0	0	<input type="checkbox"/>	
I	0	0	0	0	<input type="checkbox"/>	
J	0	0	0	0	<input type="checkbox"/>	
K	0	0	0	0	<input type="checkbox"/>	
L	0	0	0	0	<input type="checkbox"/>	
M	0	0	0	0	<input type="checkbox"/>	
N	0	0	0	0	<input type="checkbox"/>	
O	0	0	0	0	<input type="checkbox"/>	

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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) 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	FOREIGN CORP A	98-1295467	01010001	2,000	3,000	0	100
B				0	0	0	0
C				0	0	0	0
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)				3,000	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

Section 2—Additional Information on PFIC or QEF

Section 1291 and Other Information

Schedule K-3 (Form 1065) 2021

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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 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) Partner's share of average asset value	(iv) Reserved for 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			0		
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		
l Section 901(j) (total)			0		

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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) Partner's share of average asset value	(iv) Reserved for future use
2	Recaptured subpart F income		0		
3	Tested income group (total)		0		
	(1) Unit		0		
	(2) Unit		0		
4	Residual income group (total)				
	(1) Unit		0		
	(2) Unit		0		
5	Total ▶	BR	1,000		

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)	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 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 APPLIED FOR	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)			
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)	10,000	10,000	0	0	0	0	0
2 Gross rental real estate income	15,000	0	0	0	15,000	0	0
3 Other gross rental income	0	0	0	0	0	0	0
4 Guaranteed payments for services	0	0	0	0	0	0	0
5 Guaranteed payments for use of capital	0	0	0	0	0	0	0
6 Interest income	0	0	0	0	0	0	0
7 Dividends	0	0	0	0	0	0	0
8 Dividend equivalents	0	0	0	0	0	0	0
9 Royalties and license fees	0	0	0	0	0	0	0
10 Net short-term capital gain	0	0	0	0	0	0	0
11 Net long-term capital gain	0	0	0	0	0	0	0
12 Collectibles (28%) gain	0	0	0	0	0	0	0
13 Unrecaptured section 1250 gain	0	0	0	0	0	0	0
14 Net section 1231 gain	0	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	0
21 Gross income (sum of lines 1 through 20)	25,000	10,000	0	0	15,000	0	0

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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)	(3,500)	0	0	0	(3,500)	0	(3,500)
2 Research and experimental expenses	0	0	0	0	0	0	0
3 Expenses from rental real estate . .	0	0	0	0	0	0	0
4 Expenses from other rental activities .	0	0	0	0	0	0	0
5 Royalty and licensing expenses . .	0	0	0	0	0	0	0
6 Section 179 deduction	0	0	0	0	0	0	0
7 Interest expense on U.S.-booked liabilities	0	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	0
9 Other interest expense	0	0	0	0	0	0	0
10 Section 59(e)(2) expenditures . . .	0	0	0	0	0	0	0
11 Net short-term capital loss	0	0	0	0	0	0	0
12 Net long-term capital loss	0	0	0	0	0	0	0
13 Collectibles loss	0	0	0	0	0	0	0
14 Net section 1231 loss	0	0	0	0	0	0	0
15 Other losses	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	0
18 Other ►	0	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						

Name of partnership K-3 ALL PARTS	EIN APPLIED FOR	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 4,500 b Worldwide gross income 25,000			6 Reserved for future use <table border="1"> <tr> <td></td> <td>(i)</td> <td>(ii)</td> <td>(iii)</td> </tr> <tr> <td>a</td> <td></td> <td></td> <td></td> </tr> <tr> <td>b</td> <td></td> <td></td> <td></td> </tr> </table>				(i)	(ii)	(iii)	a				b			
	(i)	(ii)	(iii)														
a																	
b																	
2 Assets a Average U.S. assets (inside basis) 0 b Worldwide assets 0			7 Other allocation and apportionment key <table border="1"> <tr> <td></td> <td>(i) Key/Factor</td> <td>(ii) Allocation</td> </tr> <tr> <td>a</td> <td></td> <td>0</td> </tr> <tr> <td>b</td> <td></td> <td>0</td> </tr> </table>				(i) Key/Factor	(ii) Allocation	a		0	b		0			
	(i) Key/Factor	(ii) Allocation															
a		0															
b		0															
3 Liabilities a U.S.-booked liabilities of partnership 0 b Directly allocated partnership indebtedness 0			8 Other allocation and apportionment key <table border="1"> <tr> <td></td> <td>(i) Key/Factor</td> <td>(ii) Allocation</td> </tr> <tr> <td>a</td> <td></td> <td>0</td> </tr> <tr> <td>b</td> <td></td> <td>0</td> </tr> </table>				(i) Key/Factor	(ii) Allocation	a		0	b		0			
	(i) Key/Factor	(ii) Allocation															
a		0															
b		0															
4 Personnel a Personnel of U.S. trade or business 0 b Worldwide personnel 0																	
5 Gross receipts from sales or services by SIC code <table border="1"> <tr> <td></td> <td>(i) SIC code</td> <td>(ii) ECI</td> <td>(iii) Worldwide</td> </tr> <tr> <td>a</td> <td>100</td> <td>7,777</td> <td>8,888</td> </tr> <tr> <td>b</td> <td></td> <td>0</td> <td>0</td> </tr> </table>				(i) SIC code	(ii) ECI	(iii) Worldwide	a	100	7,777	8,888	b		0	0			
	(i) SIC code	(ii) ECI	(iii) Worldwide														
a	100	7,777	8,888														
b		0	0														

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			

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 Determination	(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