



Statistics of Income

Partnership Returns Line Item Estimates

2023



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2023 Statistics of Income

Dr. Mark Xu

Deputy Chief Data and Analytics Officer
—Statistics
Director, Statistics of Income (SOI)

Partnership Returns Line Item Estimates 2023

Publication 5035 (Rev. 12–2025)

The 2023 Partnership Returns Line Item Estimates (Publication 5035) presents estimates of frequencies of taxpayer entries recorded on the applicable lines of the forms and schedules filed with partnership returns. This publication also contains corresponding population estimates of dollar amounts recorded on those lines (as applicable).

The Statistics of Income (SOI) Division also makes the results of its studies available on SOI's Tax Stats webpage. You can sample our products by visiting our internet site at <http://www.irs.gov/statistics>.

The SOI Statistical Information Services (SIS) staff provides data, statistical analysis, and information in response to requests from customers. In addition, the SIS staff provides data referral services, acts as a liaison between requesters and IRS analysts on technical questions, and answers questions on the availability of SOI data. The SIS staff can be reached by e-mail at sis@irs.gov.

Suggested Citation

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2023 Partnership Returns

Line Item Estimates

Estimates constructed from different samples usually vary. The standard error of an estimate is a measure of its variation among all possible samples. The standard error is used to measure the precision with which an estimate from a particular sample approximates the average result of all the possible samples. The sample estimate and an estimate of its standard error are used to construct an interval estimate with prescribed confidence that the interval includes the actual population value. The coefficients of variation (CV) allow for the comparison of sampling errors across variables. The CV is often presented as a percentage—the ratio of the standard error of the estimate over the estimate itself and multiplied by 100.

The Statistics of Income (SOI) Division used the sample selected for its 2023 Partnership Returns Study to produce the line item estimates presented here. This sample is one of many possible samples that SOI could have randomly selected using the same design. As with any sample, it is subject to the data limitations that occur in statistical sampling. The estimates are not actual line item counts or money amounts. The table below shows the CV and the lower and upper bounds of computed 95%-confidence intervals for selected variable totals that SOI estimated from the 2023 sample.

SOI TY 2023 Form 1065 Line Item Estimates Table (Money amounts are in thousands)

Line Item	Line Amount (\$)	CV (%)	Lower Bound	Upper Bound
Business Receipts	8,061,139,481	0.25	8,021,597,045	8,100,681,916
Cost of Goods Sold	4,422,371,672	0.37	4,390,657,791	4,454,085,553
Depreciation	253,041,716	1.27	246,744,251	259,339,182
Interest Paid	175,565,718	0.9	172,474,796	178,656,640
Interest Income	625,515,194	0.73	616,575,731	634,454,656
Net Income	1,680,889,186	0.94	1,649,793,229	1,711,985,142
Net Rental Real Estate Loss	(324,218,397)	1.86	(336,057,488)	(312,379,307)
Net Rental Real Estate Income	223,596,023	1.89	215,326,822	231,865,223
Number of Partners	30,239,463	2.09	29,000,983	31,477,943
Number of Returns	4,575,279	0.64	4,518,199	4,632,359
Ordinary Business Loss	(498,917,356)	1.45	(513,119,569)	(484,715,142)
Ordinary Business Income	1,262,709,449	0.71	1,245,239,279	1,280,179,619
Other Net Rental Loss	(11,371,294)	10.69	(13,752,830)	(8,989,759)
Other Net Rental Income	12,695,309	7.01	10,950,894	14,439,723
Portfolio Income Dist. to Partners	1,016,395,453	0.64	1,003,574,943	1,029,215,963
Taxes & Licenses	165,610,008	0.73	163,231,784	167,988,232
Total Income Minus Deductions	2,099,412,354	1.27	2,047,258,145	2,151,566,564
Total Assets	57,322,271,527	0.1	57,207,976,427	57,436,566,627
Total Deductions	8,212,882,736	0.27	8,168,809,940	8,256,955,532
Total Income	8,976,674,829	0.26	8,931,162,608	9,022,187,050
Total Receipts	11,969,273,719	0.23	11,914,415,968	12,024,131,469

SOI rounded all values on the money amount pages to the nearest \$1,000, and rounded amounts of \$500 or more to the next thousand. All money amounts and frequencies were subject to rounding errors.

To avoid disclosing information about specific partnerships, SOI deleted certain estimates and marked them with a [d]. SOI does not force all forms to balance; however, if a disclosed field could be calculated by subtraction from a total, SOI deleted a second value. An estimate based on fewer than 10 returns, and not selected at the 100-percent rate, was indicated by an asterisk (*) and considered statistically unreliable. Researchers should use these values in conjunction with other data sources due to the small sample size.

SOI excluded 9 attachments to Form 1065, U.S. Return of Partnership Income that were included in the 2023 Partnership Returns Study because the quantities represented in the sample were insufficient for this publication. These attachments are:

- Form 3800, General Business Credit
- Form 5884-A, Employee Retention Credit for Employers Affected by Qualified Disasters
- Form 8820, Orphan Drug Credit
- Form 8845, Indian Employment Credit
- Form 8864, Biodiesel and Renewable Diesel Fuels Credit
- Form 8874, New Markets Credit
- Form 8896, Low Sulfur Diesel Fuel Production Credit
- Form 8910, Alternative Motor Vehicle Credit
- Form 8941, Credit for Small Employer Health Insurance Premiums

SOI based the statistics for Tax Year 2023 on a stratified probability sample selected from the population of partnerships processed by the Internal Revenue Service (IRS) during Calendar Year 2024.

PART YEAR FILERS		U.S. Return of Partnership Income		OMB No. 1545-0123	
Form 1065 Department of the Treasury Internal Revenue Service		For calendar year 2023, or tax year beginning 157,021 , 2023, ending 4,575,280 , 20____ Go to www.irs.gov/Form1065 for instructions and the latest information.		2023	
A Principal business activity		Name of partnership		D Employer identification number	
4,575,280		4,575,280 NUMBER OF PARTNERSHIPS			
B Principal product or service	Type or Print	Number, street, and room or suite no. If a P.O. box, see instructions.		E Date business started	
		4,384,311 NUMBER OF E-FILED RETURNS		4,575,280	
C Business code number		City or town, state or province, country, and ZIP or foreign postal code		F Total assets (see instructions)	
4,515,613				\$	
G Check applicable boxes: (1) <input type="checkbox"/> Initial return (2) <input checked="" type="checkbox"/> Final return (3) <input type="checkbox"/> Name change (4) <input type="checkbox"/> Address change (5) <input type="checkbox"/> Amended return					
H Check accounting method: (1) <input type="checkbox"/> Cash (2) <input checked="" type="checkbox"/> Accrual (3) <input type="checkbox"/> Other (specify): 41,126					
I Number of Schedules K-1. Attach one for each person who was a partner at any time during the tax year: 4,575,280					
J Check if Schedules C and M-3 are attached: 3,352,867 1,053,024 16,424 219,393 <input type="checkbox"/>					
K Check if partnership: (1) <input checked="" type="checkbox"/> Aggregated activities for section 465 at-risk purposes (2) <input type="checkbox"/> Grouped activities for section 469 passive activity purposes					
Caution: Include only trade or business income and expenses on lines 1a through 23 below. See instructions for more information.					
Income	1a	Gross receipts or sales	1,551,664	b Less returns and allowances	138,334
	2	Cost of goods sold (attach Form 1125-A)		c Balance	1,549,222
	3	Gross profit. Subtract line 2 from line 1c		1c	801,763
	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)		2	1,578,020
	5	Net farm profit (loss) (attach Schedule F (Form 1040))		3	362,004
	6	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797)		4	139,213
	7	Other income (loss) (attach statement)		5	120,152
	8	Total income (loss). Combine lines 3 through 7		6	486,115
Deductions <small>(see instructions for limitations)</small>	9	Salaries and wages (other than to partners) (less employment credits)		7	2,128,655
	10	Guaranteed payments to partners		8	560,036
	11	Repairs and maintenance		9	247,694
	12	Bad debts		10	761,773
	13	Rent		11	73,838
	14	Taxes and licenses		12	773,139
	15	Interest (see instructions)		13	1,358,213
	16a	Depreciation (if required, attach Form 4562)	1,228,157	14	591,842
	b	Less depreciation reported on Form 1125-A and elsewhere on return	445,769	15	
	17	Depletion (Do not deduct oil and gas depletion.)		16a	807,795
	18	Retirement plans, etc.		16b	1,525
	19	Employee benefit programs		16c	100,053
	20	Energy efficient commercial buildings deduction (attach Form 7205)		17	224,916
	21	Other deductions (attach statement)		18	591
	22	Total deductions. Add the amounts shown in the far right column for lines 9 through 21		19	2,187,191
Tax and Payment	23	Ordinary business income (loss). Subtract line 22 from line 8		20	2,326,755
	24	Interest due under the look-back method—completed long-term contracts (attach Form 8697)		21	2,642,531
	25	Interest due under the look-back method—income forecast method (attach Form 8866)		22	
	26	BBA AAR imputed underpayment (see instructions)		23	[d]
	27	Other taxes (see instructions)		24	[d]
	28	Total balance due. Add lines 24 through 27		25	0
	29	Elective payment election amount from Form 3800		26	*272
	30	Payment (see instructions)		27	294
	31	Amount owed. If the sum of line 29 and line 30 is smaller than line 28, enter amount owed		28	*12
	32	Overpayment. If the sum of line 29 and line 30 is larger than line 28, enter overpayment		29	978
Sign Here	Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than partner or limited liability company member) is based on all information of which preparer has any knowledge.				
	Signature of partner or limited liability company member _____ Date _____				
Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	4,272,966				
	Firm's name			Firm's EIN	
	Firm's address			Phone no.	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 11390Z

Form 1065 (2023)

Form 1065 Department of the Treasury Internal Revenue Service	U.S. Return of Partnership Income For calendar year 2023, or tax year beginning _____, 2023, ending _____, 20_____. Go to www.irs.gov/Form1065 for instructions and the latest information.			OMB No. 1545-0123 <div style="font-size: 2em; font-weight: bold; text-align: center;">2023</div>																																																																																																																																
A Principal business activity B Principal product or service C Business code number	Type or Print	Name of partnership Number, street, and room or suite no. If a P.O. box, see instructions. City or town, state or province, country, and ZIP or foreign postal code		D Employer identification number E Date business started F Total assets (see instructions) \$																																																																																																																																
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Income	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">1a</td> <td style="width:45%;">Gross receipts or sales</td> <td style="width:10%;">8,252,647,035</td> <td style="width:5%;">b</td> <td style="width:45%;">Less returns and allowances</td> <td style="width:10%;">191,507,554</td> <td style="width:5%;">c</td> <td style="width:10%;">Balance</td> <td style="width:5%;">1c</td> <td style="width:10%;">8,061,139,481</td> </tr> <tr> <td>2</td> <td>Cost of goods sold (attach Form 1125-A)</td> <td></td> <td>2</td> <td></td> <td></td> <td>2</td> <td>4,422,371,672</td> <td>3</td> <td>3,638,767,809</td> </tr> <tr> <td>3</td> <td>Gross profit. Subtract line 2 from line 1c</td> <td></td> <td>4</td> <td>Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)</td> <td></td> <td>4</td> <td>181,699,485</td> <td>5</td> <td>-4,747,319</td> </tr> <tr> <td>4</td> <td></td> <td></td> <td>5</td> <td>Net farm profit (loss) (attach Schedule F (Form 1040))</td> <td></td> <td>5</td> <td>57,775,440</td> <td>6</td> <td>482,065,792</td> </tr> <tr> <td>5</td> <td></td> <td></td> <td>6</td> <td>Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797)</td> <td></td> <td>6</td> <td>4,355,561,206</td> <td>7</td> <td>4,355,561,206</td> </tr> <tr> <td>6</td> <td></td> <td></td> <td>7</td> <td>Other income (loss) (attach statement)</td> <td></td> <td>7</td> <td></td> <td>8</td> <td></td> </tr> <tr> <td>7</td> <td></td> <td></td> <td>8</td> <td>Total income (loss). Combine lines 3 through 7</td> <td></td> <td>8</td> <td></td> <td></td> <td></td> </tr> </table>				1a	Gross receipts or sales	8,252,647,035	b	Less returns and allowances	191,507,554	c	Balance	1c	8,061,139,481	2	Cost of goods sold (attach Form 1125-A)		2			2	4,422,371,672	3	3,638,767,809	3	Gross profit. Subtract line 2 from line 1c		4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)		4	181,699,485	5	-4,747,319	4			5	Net farm profit (loss) (attach Schedule F (Form 1040))		5	57,775,440	6	482,065,792	5			6	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797)		6	4,355,561,206	7	4,355,561,206	6			7	Other income (loss) (attach statement)		7		8		7			8	Total income (loss). Combine lines 3 through 7		8																																																													
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Tax and Payment	<table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">24</td> <td style="width:45%;">Interest due under the look-back method—completed long-term contracts (attach Form 8697)</td> <td style="width:10%;"></td> <td style="width:5%;">24</td> <td style="width:45%;"></td> <td style="width:10%;"></td> <td style="width:5%;">24</td> <td style="width:10%;">[d]</td> </tr> <tr> <td>25</td> <td>Interest due under the look-back method—income forecast method (attach Form 8866)</td> <td></td> <td>25</td> <td></td> <td></td> <td>25</td> <td>[d]</td> </tr> <tr> <td>26</td> <td>BBA AAR imputed underpayment (see instructions)</td> <td></td> <td>26</td> <td></td> <td></td> <td>26</td> <td>0</td> </tr> <tr> <td>27</td> <td>Other taxes (see instructions)</td> <td></td> <td>27</td> <td></td> <td></td> <td>27</td> <td>*35,118</td> </tr> <tr> <td>28</td> <td>Total balance due. Add lines 24 through 27</td> <td></td> <td>28</td> <td></td> <td></td> <td>28</td> <td>44,448</td> </tr> <tr> <td>29</td> <td>Elective payment election amount from Form 3800</td> <td></td> <td>29</td> <td></td> <td></td> <td>29</td> <td>*249,560</td> </tr> <tr> <td>30</td> <td>Payment (see instructions)</td> <td></td> <td>30</td> <td></td> <td></td> <td>30</td> <td>45,306</td> </tr> <tr> <td>31</td> <td>Amount owed. If the sum of line 29 and line 30 is smaller than line 28, enter amount owed</td> <td></td> <td>31</td> <td></td> <td></td> <td>31</td> <td>2,583</td> </tr> <tr> <td>32</td> <td>Overpayment. If the sum of line 29 and line 30 is larger than line 28, enter overpayment</td> <td></td> <td>32</td> <td></td> <td></td> <td>32</td> <td>253,001</td> </tr> </table>				24	Interest due under the look-back method—completed long-term contracts (attach Form 8697)		24			24	[d]	25	Interest due under the look-back method—income forecast method (attach Form 8866)		25			25	[d]	26	BBA AAR imputed underpayment (see instructions)		26			26	0	27	Other taxes (see instructions)		27			27	*35,118	28	Total balance due. Add lines 24 through 27		28			28	44,448	29	Elective payment election amount from Form 3800		29			29	*249,560	30	Payment (see instructions)		30			30	45,306	31	Amount owed. If the sum of line 29 and line 30 is smaller than line 28, enter amount owed		31			31	2,583	32	Overpayment. If the sum of line 29 and line 30 is larger than line 28, enter overpayment		32			32	253,001																																																								
24	Interest due under the look-back method—completed long-term contracts (attach Form 8697)		24			24	[d]																																																																																																																													
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32	Overpayment. If the sum of line 29 and line 30 is larger than line 28, enter overpayment		32			32	253,001																																																																																																																													
Sign Here Paid Preparer Use Only	Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than partner or limited liability company member) is based on all information of which preparer has any knowledge.																																																																																																																																			
	Signature of partner or limited liability company member _____		Date _____																																																																																																																																	
	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed PTIN																																																																																																																																
	Firm's name	Firm's EIN																																																																																																																																		
	Firm's address	Phone no.																																																																																																																																		

May the IRS discuss this return with the preparer shown below?
 See instructions. ☐ Yes ☐ No

For Paperwork Reduction Act Notice, see separate instructions.
 Cat. No. 11390Z Form **1065** (2023)

1	What type of entity is filing this return? Check the applicable box:				Yes	No
a	<input type="checkbox"/> Domestic general partnership		b <input type="checkbox"/> Domestic limited partnership			
c	<input type="checkbox"/> Domestic limited liability company		d <input type="checkbox"/> Domestic limited liability partnership			
e	<input type="checkbox"/> Foreign partnership		f <input type="checkbox"/> Other: _____			
2	At the end of the tax year:					
a	Did any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, or tax-exempt organization, or any foreign government own, directly or indirectly, an interest of 50% or more in the profit, loss, or capital of the partnership? For rules of constructive ownership, see instructions. If "Yes," attach Schedule B-1, Information on Partners Owning 50% or More of the Partnership					
b	Did any individual or estate own, directly or indirectly, an interest of 50% or more in the profit, loss, or capital of the partnership? For rules of constructive ownership, see instructions. If "Yes," attach Schedule B-1, Information on Partners Owning 50% or More of the Partnership					
3	At the end of the tax year, did the partnership:					
a	Own directly 20% or more, or own, directly or indirectly, 50% or more of the total voting power of all classes of stock entitled to vote of any foreign or domestic corporation? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (iv) below					
(i) Name of Corporation		(ii) Employer Identification Number (if any)	(iii) Country of Incorporation	(iv) Percentage Owned in Voting Stock		
b	Own directly an interest of 20% or more, or own, directly or indirectly, an interest of 50% or more in the profit, loss, or capital in any foreign or domestic partnership (including an entity treated as a partnership) or in the beneficial interest of a trust? For rules of constructive ownership, see instructions. If "Yes," complete (i) through (v) below					
(i) Name of Entity		(ii) Employer Identification Number (if any)	(iii) Type of Entity	(iv) Country of Organization	(v) Maximum Percentage Owned in Profit, Loss, or Capital	
No money amounts are present on the page.						
4	Does the partnership satisfy all four of the following conditions?				Yes	No
a	The partnership's total receipts for the tax year were less than \$250,000.					
b	The partnership's total assets at the end of the tax year were less than \$1 million.					
c	Schedules K-1 are filed with the return and furnished to the partners on or before the due date (including extensions) for the partnership return.					
d	The partnership is not filing and is not required to file Schedule M-3 If "Yes," the partnership is not required to complete Schedules L, M-1, and M-2; item F on page 1 of Form 1065; or item L on Schedule K-1.					
5	Is this partnership a publicly traded partnership, as defined in section 469(k)(2)?					
6	During the tax year, did the partnership have any debt that was canceled, was forgiven, or had the terms modified so as to reduce the principal amount of the debt?					
7	Has this partnership filed, or is it required to file, Form 8918, Material Advisor Disclosure Statement, to provide information on any reportable transaction?					
8	At any time during calendar year 2023, did the partnership have an interest in or a signature or other authority over a financial account in a foreign country (such as a bank account, securities account, or other financial account)? See instructions for exceptions and filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR). If "Yes," enter the name of the foreign country _____					
9	At any time during the tax year, did the partnership receive a distribution from, or was it the grantor of, or transferor to, a foreign trust? If "Yes," the partnership may have to file Form 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts. See instructions					
10a	Is the partnership making, or had it previously made (and not revoked), a section 754 election? If "Yes," enter the effective date of the election _____ See instructions for details regarding a section 754 election.					
b	For this tax year, did the partnership make an optional basis adjustment under section 743(b)? If "Yes," enter the total aggregate net positive amount \$ _____ and the total aggregate net negative amount \$ (_____) of such section 743(b) adjustments for all partners made in the tax year. The partnership must also attach a statement showing the computation and allocation of each basis adjustment. See instructions					

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Schedule B Other Information (continued)		Yes	No
c	For this tax year, did the partnership make an optional basis adjustment under section 734(b)? If "Yes," enter the total aggregate net positive amount \$ <u>5,184</u> and the total aggregate net negative amount \$ (<u>1,047</u>) of such section 734(b) adjustments for all partnership property made in the tax year. The partnership must also attach a statement showing the computation and allocation of each basis adjustment. See instructions	Y: <u>7,171</u> N: <u>4,267,098</u>	
d	For this tax year, is the partnership required to adjust the basis of partnership property under section 743(b) or 734(b) because of a substantial built-in loss (as defined under section 743(d)) or substantial basis reduction (as defined under section 734(d))? If "Yes," enter the total aggregate amount of such section 743(b) adjustments and/or section 734(b) adjustments for all partners and/or partnership property made in the tax year \$ <u>1,102</u> . The partnership must also attach a statement showing the computation and allocation of the basis adjustment. See instructions	Y: <u>1,725</u> N: <u>4,394,238</u>	
11	Check this box if, during the current or prior tax year, the partnership distributed any property received in a like-kind exchange or contributed such property to another entity (other than disregarded entities wholly owned by the partnership throughout the tax year) <u>946</u> <input type="checkbox"/>		
12	At any time during the tax year, did the partnership distribute to any partner a tenancy-in-common or other undivided interest in partnership property?	Y: <u>3,883</u> N: <u>4,216,672</u>	
13	If the partnership is required to file Form 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), enter the number of Forms 8858 attached. See instructions <u>10,131</u>		
14	Does the partnership have any foreign partners? If "Yes," enter the number of Forms 8805, Foreign Partner's Information Statement of Section 1446 Withholding Tax, filed for this partnership <u>98,233</u>	Y: <u>176,411</u> N: <u>4,324,416</u>	
15	Enter the number of Forms 8865, Return of U.S. Persons With Respect to Certain Foreign Partnerships, attached to this return <u>18,723</u>		
16a	Did you make any payments in 2023 that would require you to file Form(s) 1099? See instructions	Y: <u>1,394,703</u> N: <u>2,789,095</u>	
b	If "Yes," did you or will you file required Form(s) 1099?	Y: <u>1,366,988</u> N: <u>690,786</u>	
17	Enter the number of Forms 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations, attached to this return <u>13,028</u>		
18	Enter the number of partners that are foreign governments under section 892 <u>4,309</u>		
19	During the partnership's tax year, did the partnership make any payments that would require it to file Forms 1042 and 1042-S under chapter 3 (sections 1441 through 1464) or chapter 4 (sections 1471 through 1474)? Y: <u>27,663</u>	N: <u>4,171,002</u>	
20	Was the partnership a specified domestic entity required to file Form 8938 for the tax year? See the Instructions for Form 8938	Y: <u>11,919</u> N: <u>4,181,465</u>	
21	Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Y: <u>11,541</u>	N: <u>4,315,636</u>	
22	During the tax year, did the partnership pay or accrue any interest or royalty for which one or more partners are not allowed a deduction under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions \$ <u>606</u>	Y: <u>4,553,179</u> N: <u>606</u>	
23	Did the partnership have an election under section 163(j) for any real property trade or business or any farming business in effect during the tax year? See instructions Y: <u>226,875</u>	N: <u>4,131,271</u>	
24	Does the partnership satisfy one or more of the following? See instructions a The partnership owns a pass-through entity with current, or prior year carryover, excess business interest expense. b The partnership's aggregate average annual gross receipts (determined under section 448(c)) for the 3 tax years preceding the current tax year are more than \$29 million and the partnership has business interest expense. c The partnership is a tax shelter (see instructions) and the partnership has business interest expense. If "Yes" to any, complete and attach Form 8990.	Y: <u>137,447</u> N: <u>4,208,862</u>	
25	Is the partnership attaching Form 8996 to certify as a Qualified Opportunity Fund? If "Yes," enter the amount from Form 8996, line 15 \$	Y: <u>17,970</u> N: <u>4,059,241</u>	
26	Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership <u>177</u> Complete Schedule K-3 (Form 1065), Part XIII, for each foreign partner subject to section 864(c)(8) on a transfer or distribution.		
27	At any time during the tax year, were there any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8?	Y: <u>5,399</u> N: <u>4,049,063</u>	
28	Since December 22, 2017, did a foreign corporation directly or indirectly acquire substantially all of the properties constituting a trade or business of your partnership, and was the ownership percentage (by vote or value) for purposes of section 7874 greater than 50% (for example, the partners held more than 50% of the stock of the foreign corporation)? If "Yes," list the ownership percentage by vote and by value. See instructions. Percentage: By vote: <u>*148</u> By value: <u>*126</u>	Y: <u>*153</u> N: <u>4,547,084</u>	
29	Is the partnership required to file Form 7208 relating to the excise tax on repurchase of corporate stock (see instructions): a Under the applicable foreign corporation rules?	Y: <u>*410</u> N: <u>3,980,270</u>	

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Schedule B Other Information <i>(continued)</i>		Yes	No
c	For this tax year, did the partnership make an optional basis adjustment under section 734(b)? If "Yes," enter the total aggregate net positive amount \$ _____ and the total aggregate net negative amount \$ (_____) of such section 734(b) adjustments for all partnership property made in the tax year. The partnership must also attach a statement showing the computation and allocation of each basis adjustment. See instructions		
d	For this tax year, is the partnership required to adjust the basis of partnership property under section 743(b) or 734(b) because of a substantial built-in loss (as defined under section 743(d)) or substantial basis reduction (as defined under section 734(d))? If "Yes," enter the total aggregate amount of such section 743(b) adjustments and/or section 734(b) adjustments for all partners and/or partnership property made in the tax year \$ _____. The partnership must also attach a statement showing the computation and allocation of the basis adjustment. See instructions		
11	Check this box if, during the current or prior tax year, the partnership distributed any property received in a like-kind exchange or contributed such property to another entity (other than disregarded entities wholly owned by the partnership throughout the tax year) <input type="checkbox"/>		
12	At any time during the tax year, did the partnership distribute to any partner a tenancy-in-common or other undivided interest in partnership property?		
13	If the partnership is required to file Form 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), enter the number of Forms 8858 attached. See instructions 38		
14	Does the partnership have any foreign partners? If "Yes," enter the number of Forms 8805, Foreign Partner's Information Statement of Section 1446 Withholding Tax, filed for this partnership 427		
15	Enter the number of Forms 8865, Return of U.S. Persons With Respect to Certain Foreign Partnerships, attached to this return 51		
16a	Did you make any payments in 2023 that would require you to file Form(s) 1099? See instructions		
b	If "Yes," did you or will you file required Form(s) 1099?		
17	Enter the number of Forms 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations, attached to this return 51		
18	Enter the number of partners that are foreign governments under section 892 15		
19	During the partnership's tax year, did the partnership make any payments that would require it to file Forms 1042 and 1042-S under chapter 3 (sections 1441 through 1464) or chapter 4 (sections 1471 through 1474)?		
20	Was the partnership a specified domestic entity required to file Form 8938 for the tax year? See the Instructions for Form 8938		
21	Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)?		
22	During the tax year, did the partnership pay or accrue any interest or royalty for which one or more partners are not allowed a deduction under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions \$ 254,462		
23	Did the partnership have an election under section 163(j) for any real property trade or business or any farming business in effect during the tax year? See instructions		
24	Does the partnership satisfy one or more of the following? See instructions a The partnership owns a pass-through entity with current, or prior year carryover, excess business interest expense. b The partnership's aggregate average annual gross receipts (determined under section 448(c)) for the 3 tax years preceding the current tax year are more than \$29 million and the partnership has business interest expense. c The partnership is a tax shelter (see instructions) and the partnership has business interest expense. If "Yes" to any, complete and attach Form 8990.		
25	Is the partnership attaching Form 8996 to certify as a Qualified Opportunity Fund? If "Yes," enter the amount from Form 8996, line 15 \$ _____		
26	Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership 2 Complete Schedule K-3 (Form 1065), Part XIII, for each foreign partner subject to section 864(c)(8) on a transfer or distribution.		
27	At any time during the tax year, were there any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8?		
28	Since December 22, 2017, did a foreign corporation directly or indirectly acquire substantially all of the properties constituting a trade or business of your partnership, and was the ownership percentage (by vote or value) for purposes of section 7874 greater than 50% (for example, the partners held more than 50% of the stock of the foreign corporation)? If "Yes," list the ownership percentage by vote and by value. See instructions. Percentage: _____ By vote: _____ By value: _____		
29	Is the partnership required to file Form 7208 relating to the excise tax on repurchase of corporate stock (see instructions): a Under the applicable foreign corporation rules?		

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Form 1065 (2023)

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Schedule B Other Information <i>(continued)</i>		Yes	No
b	Under the covered surrogate foreign corporation rules? If "Yes" to either (a) or (b), complete Form 7208, Excise Tax on Repurchase of Corporate Stock. See the Instructions for Form 7208.	Y:	[d]
		N:	3,963,481
30	At any time during this tax year, did the partnership (a) receive (as a reward, award, or payment for property or services); or (b) sell, exchange, or otherwise dispose of a digital asset (or financial interest in a digital asset)? See instructions	Y:	13,977
		N:	3,945,027
31	Is the partnership electing out of the centralized partnership audit regime under section 6221(b)? See instructions If "Yes," the partnership must complete Schedule B-2 (Form 1065). Enter the total from Schedule B-2, Part III, line 3 1,302,014 If "No," complete Designation of Partnership Representative below.	Y:	1,302,323
		N:	3,137,359

Designation of Partnership Representative (see instructions)

Enter below the information for the partnership representative (PR) for the tax year covered by this return.

Name of PR

U.S. address
of PRU.S. phone
number of PR

If the PR is an entity, name of the designated individual for the PR

U.S. address of
designated individualU.S. phone number of
designated individualForm **1065** (2023)

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Schedule B	Other Information (continued)	Yes	No
b	Under the covered surrogate foreign corporation rules? If "Yes" to either (a) or (b), complete Form 7208, Excise Tax on Repurchase of Corporate Stock. See the Instructions for Form 7208.		
30	At any time during this tax year, did the partnership (a) receive (as a reward, award, or payment for property or services); or (b) sell, exchange, or otherwise dispose of a digital asset (or financial interest in a digital asset)? See instructions		
31	Is the partnership electing out of the centralized partnership audit regime under section 6221(b)? See instructions If "Yes," the partnership must complete Schedule B-2 (Form 1065). Enter the total from Schedule B-2, Part III, line 3 3.640 If "No," complete Designation of Partnership Representative below.		

Designation of Partnership Representative (see instructions)
Enter below the information for the partnership representative (PR) for the tax year covered by this return.

Name of PR	
U.S. address of PR	U.S. phone number of PR
If the PR is an entity, name of the designated individual for the PR	
U.S. address of designated individual	U.S. phone number of designated individual

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TOTAL SCHEDULES K FILED: 4,575,280

TOTAL SCHEDULES K E-FILED: 4,384,311

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Schedule K		Partners' Distributive Share Items	Total amount
Income (Loss)	1	Ordinary business income (loss) (page 1, line 23)	1 2,642,531
	2	Net rental real estate income (loss) (attach Form 8825)	2 2,059,590
	3a	Other gross rental income (loss)	3a 68,980
	b	Expenses from other rental activities (attach statement)	3b 40,105
	c	Other net rental income (loss). Subtract line 3b from line 3a	3c 76,161
	4	Guaranteed payments: a Services 4a 294,066 b Capital 4b 15,188	4c 308,335
	5	Interest income	5 1,306,811
	6	Dividends and dividend equivalents: a Ordinary dividends 6a 313,100	6b 233,752 c Dividend equivalents 6c 7,322
	7	Royalties	7 83,671
	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8 214,540
	9a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a 350,706
Deductions	b	Collectibles (28%) gain (loss)	9b 4,012
	c	Unrecaptured section 1250 gain (attach statement)	9c 150,851
	10	Net section 1231 gain (loss) (attach Form 4797)	10 332,103
	11	Other income (loss) (see instructions) Type: _____	11 205,809
	12	Section 179 deduction (attach Form 4562)	12 195,974
Self-Employment	13a	Cash contributions	13a 419,477
	b	Noncash contributions	13b 20,361
	c	Investment interest expense	13c 148,918
	d	Section 59(e)(2) expenditures: (1) Type: _____ (2) Amount: _____	13d(2) 34,169
	e	Other deductions (see instructions) Type: _____	13e 764,726
Credits	14a	Net earnings (loss) from self-employment	14a 1,811,743
	b	Gross farming or fishing income	14b 109,331
	c	Gross nonfarm income	14c 1,171,295
	15a	Low-income housing credit (section 42(j)(5))	15a 346
	b	Low-income housing credit (other)	15b 23,632
	c	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468, if applicable)	15c *63
Inter-national	d	Other rental real estate credits (see instructions) Type: _____	15d 396
	e	Other rental credits (see instructions) Type: _____	15e *40
Alternative Minimum Tax (AMT) Items	f	Other credits (see instructions) Type: _____	15f 126,256
	16	Attach Schedule K-2 (Form 1065), Partners' Distributive Share Items—International, and check this box to indicate that you are reporting items of international tax relevance . 917,578 <input type="checkbox"/>	
	17a	Post-1986 depreciation adjustment	17a 732,085
	b	Adjusted gain or loss	17b 95,583
	c	Depletion (other than oil and gas)	17c 4,674
	d	Oil, gas, and geothermal properties—gross income	17d 48,358
Other Information	e	Oil, gas, and geothermal properties—deductions	17e 45,129
	f	Other AMT items (attach statement)	17f 66,271
	18a	Tax-exempt interest income	18a 72,707
	b	Other tax-exempt income	18b 88,185
	c	Nondeductible expenses	18c 1,250,161
	19a	Distributions of cash and marketable securities	19a 1,878,680
	b	Distributions of other property	19b 49,419
	20a	Investment income	20a 1,374,934
	b	Investment expenses	20b 218,956
	c	Other items and amounts (attach statement)	
	21	Total foreign taxes paid or accrued	21 133,723

Form 1065 (2023)

Form 1065 (2023)

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Schedule K		Partners' Distributive Share Items		Total amount			
Income (Loss)	1	Ordinary business income (loss) (page 1, line 23)			1	763,792,093	
	2	Net rental real estate income (loss) (attach Form 8825)			2	-100,622,375	
	3a	Other gross rental income (loss)			3a	31,767,306	
	b	Expenses from other rental activities (attach statement)			3b	30,443,292	
	c	Other net rental income (loss). Subtract line 3b from line 3a			3c	1,324,014	
	4	Guaranteed payments: a Services	4a	96,075,207	b Capital	4b	14,823,665
	c	Total. Add lines 4a and 4b			4c	110,970,081	
	5	Interest income			5	625,515,194	
	6	Dividends and dividend equivalents: a Ordinary dividends			6a	319,951,607	
	b	Qualified dividends	6b	182,176,649	c Dividend equivalents	6c	1,527,020
	7	Royalties			7	70,928,652	
8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))			8	61,874,100		
9a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))			9a	627,053,499		
b	Collectibles (28%) gain (loss)			9b	774,326		
c	Unrecaptured section 1250 gain (attach statement)			9c	43,108,706		
10	Net section 1231 gain (loss) (attach Form 4797)			10	202,599,914		
11	Other income (loss) (see instructions) Type: _____			11	462,297,326		
Deductions	12	Section 179 deduction (attach Form 4562)			12	16,215,168	
	13a	Cash contributions			13a	7,668,753	
	b	Noncash contributions			13b	5,103,635	
	c	Investment interest expense			13c	274,944,122	
	d	Section 59(e)(2) expenditures: (1) Type: _____ (2) Amount: _____			13d(2)	102,859,444	
e	Other deductions (see instructions) Type: _____			13e	616,347,029		
Self-Employment	14a	Net earnings (loss) from self-employment			14a	278,221,835	
	b	Gross farming or fishing income			14b	128,951,773	
	c	Gross nonfarm income			14c	901,015,149	
Credits	15a	Low-income housing credit (section 42(j)(5))			15a	249,066	
	b	Low-income housing credit (other)			15b	21,306,207	
	c	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468, if applicable)			15c	*608,254	
	d	Other rental real estate credits (see instructions) Type: _____			15d	24,162	
	e	Other rental credits (see instructions) Type: _____			15e	*253	
	f	Other credits (see instructions) Type: _____			15f	17,971,517	
Inter-national	16	Attach Schedule K-2 (Form 1065), Partners' Distributive Share Items—International, and check this box to indicate that you are reporting items of international tax relevance <input type="checkbox"/>					
Alternative Minimum Tax (AMT) Items	17a	Post-1986 depreciation adjustment			17a	-1,082,685	
	b	Adjusted gain or loss			17b	-2,303,085	
	c	Depletion (other than oil and gas)			17c	1,543,367	
	d	Oil, gas, and geothermal properties—gross income			17d	249,635,562	
	e	Oil, gas, and geothermal properties—deductions			17e	136,143,075	
	f	Other AMT items (attach statement)			17f	61,185,227	
Other Information	18a	Tax-exempt interest income			18a	7,010,964	
	b	Other tax-exempt income			18b	20,996,325	
	c	Nondeductible expenses			18c	38,704,871	
	19a	Distributions of cash and marketable securities			19a	7,320,078,419	
	b	Distributions of other property			19b	455,759,082	
	20a	Investment income			20a	1,063,221,402	
	b	Investment expenses			20b	86,869,709	
	c	Other items and amounts (attach statement)					
21	Total foreign taxes paid or accrued			21	23,133,600		

Form 1065 (2023)

TOTAL SCHEDULES L FILED: 3,505,972

TOTAL SCHEDULES L E-FILED: 3,420,436

Form 1065 (2023)

Page 6

Analysis of Net Income (Loss) per Return

1	Net income (loss). Combine Schedule K, lines 1 through 11. From the result, subtract the sum of Schedule K, lines 12 through 13e, and 21					1	4,530,458
2	Analysis by partner type:	(i) Corporate	(ii) Individual (active)	(iii) Individual (passive)	(iv) Partnership	(v) Exempt Organization	(vi) Nominee/Other
a	General partners	117,141	760,218	95,194	201,217	13,112	87,343
b	Limited partners	365,724	2,070,142	1,435,131	740,881	62,251	624,711

Schedule L Balance Sheets per Books

		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
Assets					
1	Cash				3,032,130
2a	Trade notes and accounts receivable			449,524	
b	Less allowance for bad debts	45,285		50,449	
3	Inventories				273,800
4	U.S. Government obligations				8,130
5	Tax-exempt securities		4,914		4,819
6	Other current assets (attach statement)				1,129,582
7a	Loans to partners (or persons related to partners)				142,212
b	Mortgage and real estate loans				42,586
8	Other investments (attach statement)				716,280
9a	Buildings and other depreciable assets			2,209,355	
b	Less accumulated depreciation			2,159,107	
10a	Depletable assets			21,730	
b	Less accumulated depletion			17,143	
11	Land (net of any amortization)				1,422,236
12a	Intangible assets (amortizable only)			983,727	
b	Less accumulated amortization			947,193	
13	Other assets (attach statement)				804,677
14	Total assets				3,436,910
Liabilities and Capital					
15	Accounts payable				578,984
16	Mortgages, notes, bonds payable in less than 1 year				270,767
17	Other current liabilities (attach statement)				1,441,509
18	All nonrecourse loans				182,253
19a	Loans from partners (or persons related to partners)				397,724
b	Mortgages, notes, bonds payable in 1 year or more				1,002,437
20	Other liabilities (attach statement)				673,874
21	Partners' capital accounts		3,155,425		3,459,159
22	Total liabilities and capital				3,436,910

Schedule M-1 Reconciliation of Income (Loss) per Books With Analysis of Net Income (Loss) per Return**Note:** The partnership may be required to file Schedule M-3. See instructions.

1	Net income (loss) per books	3,417,029	6	Income recorded on books this year not included on Schedule K, lines 1 through 11 (itemize):	
2	Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this year (itemize):	97,528	a	Tax-exempt interest \$	187,202
3	Guaranteed payments (other than health insurance)	216,167	7	Deductions included on Schedule K, lines 1 through 13e, and 21, not charged against book income this year (itemize):	
4	Expenses recorded on books this year not included on Schedule K, lines 1 through 13e, and 21 (itemize):		a	Depreciation \$	257,923
a	Depreciation \$		8	Add lines 6 and 7	406,369
b	Travel and entertainment \$	1,107,845	9	Income (loss) (Analysis of Net Income (Loss), line 1). Subtract line 8 from line 5	3,401,582
5	Add lines 1 through 4	3,404,251			

Schedule M-2 Analysis of Partners' Capital Accounts

1	Balance at beginning of year	3,353,882	6	Distributions: a Cash	1,823,300
2	Capital contributed: a Cash	1,158,974	b Property	54,920	
	b Property	70,584	7	Other decreases (itemize):	896,309
3	Net income (loss) (see instructions)	3,695,411	8	Add lines 6 and 7	2,222,328
4	Other increases (itemize):	408,784	9	Balance at end of year. Subtract line 8 from line 5	3,606,652
5	Add lines 1 through 4	3,694,857			

TOTAL SCHEDULES M-1 FILED: 3,419,839

TOTAL SCHEDULES M-2 FILED: 4,575,274

Form 1065 (2023)

TOTAL SCHEDULES M-1 E-FILED: 3,326,538

TOTAL SCHEDULES M-2 E-FILED: 4,384,305

Analysis of Net Income (Loss) per Return

1	Net income (loss). Combine Schedule K, lines 1 through 11. From the result, subtract the sum of Schedule K, lines 12 through 13e, and 21	1	2,099,412,354
2	Analysis by partner type:		
	(i) Corporate	(ii) Individual (active)	(iii) Individual (passive)
a	General partners	180,946,034	100,826,405
b	Limited partners	402,144,437	226,606,275
		(iv) Partnership	(v) Exempt Organization
		9,837,019	115,503,940
		520,026,819	131,022,468
			(vi) Nominee/Other
			12,685,183
			170,534,129

Schedule L Balance Sheets per Books

		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
Assets					
1	Cash				2,163,032,613
2a	Trade notes and accounts receivable			1,558,532,004	
b	Less allowance for bad debts	38,778,914		43,408,568	
3	Inventories				503,080,951
4	U.S. Government obligations				112,572,812
5	Tax-exempt securities		28,648,374		29,958,009
6	Other current assets (attach statement)				4,226,254,060
7a	Loans to partners (or persons related to partners)				259,153,836
b	Mortgage and real estate loans				194,574,678
8	Other investments (attach statement)				33,412,275,021
9a	Buildings and other depreciable assets			11,087,176,683	
b	Less accumulated depreciation			3,674,851,381	
10a	Depletable assets			397,850,797	
b	Less accumulated depletion			148,776,531	
11	Land (net of any amortization)				1,883,821,102
12a	Intangible assets (amortizable only)			2,439,056,244	
b	Less accumulated amortization			590,345,031	
13	Other assets (attach statement)				3,512,314,227
14	Total assets				57,322,271,527
Liabilities and Capital					
15	Accounts payable				865,759,155
16	Mortgages, notes, bonds payable in less than 1 year				569,747,828
17	Other current liabilities (attach statement)				7,344,766,954
18	All nonrecourse loans				1,888,936,668
19a	Loans from partners (or persons related to partners)				547,746,986
b	Mortgages, notes, bonds payable in 1 year or more				6,280,598,981
20	Other liabilities (attach statement)				4,709,626,323
21	Partners' capital accounts		31,784,056,539		35,115,088,632
22	Total liabilities and capital				57,322,271,527

Schedule M-1 Reconciliation of Income (Loss) per Books With Analysis of Net Income (Loss) per Return

Note: The partnership may be required to file Schedule M-3. See instructions.

1	Net income (loss) per books	339,989,631	6	Income recorded on books this year not included on Schedule K, lines 1 through 11 (itemize):	
2	Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this year (itemize):	44,194,995	a	Tax-exempt interest \$	63,276,524
3	Guaranteed payments (other than health insurance)	40,343,177	7	Deductions included on Schedule K, lines 1 through 13e, and 21, not charged against book income this year (itemize):	
4	Expenses recorded on books this year not included on Schedule K, lines 1 through 13e, and 21 (itemize):		a	Depreciation \$	45,553,972
a	Depreciation \$	83,572,456	8	Add lines 6 and 7	108,830,496
b	Travel and entertainment \$		9	Income (loss) (Analysis of Net Income (Loss), line 1). Subtract line 8 from line 5	399,269,763
5	Add lines 1 through 4	508,100,259			

Schedule M-2 Analysis of Partners' Capital Accounts

1	Balance at beginning of year	24,437,383,359	6	Distributions: a Cash	7,663,195,037
2	Capital contributed: a Cash	7,395,403,891		b Property	303,310,704
	b Property	474,194,337	7	Other decreases (itemize):	1,082,395,546
3	Net income (loss) (see instructions)	2,127,558,425	8	Add lines 6 and 7	9,048,901,286
4	Other increases (itemize):	922,977,699	9	Balance at end of year. Subtract line 8 from line 5	26,308,616,425
5	Add lines 1 through 4	35,357,517,712			

**SCHEDULE K-2
(Form 1065)**Department of the Treasury
Internal Revenue Service

Name of partnership

TOTAL SCHEDULES K-2 FILED: 906,771

TOTAL SCHEDULES K-2 E-FILED: 902,000

Partners' Distributive Share Items—InternationalAttach to Form 1065.
Go to www.irs.gov/Form1065 for instructions and the latest information.

OMB No. 1545-0123

2023

Employer identification number (EIN)

A Is the partnership a withholding foreign partnership?☐ Yes ☐ No If "Yes," enter your WP-EIN: _____**B** Is the partnership (including the home office or any branch) a qualified derivatives dealer?☐ Yes ☐ No If "Yes," enter your QI-EIN: _____**C** Check to indicate the parts of Schedule K-2 that apply.

	Yes	No
1 Does Part I apply? If "Yes," complete and attach Part I	1	
2 Does Part II apply? If "Yes," complete and attach Part II	2	
3 Does Part III apply? If "Yes," complete and attach Part III	3	
4 Does Part IV apply? If "Yes," complete and attach Part IV	4	
5 Does Part V apply? If "Yes," complete and attach Part V	5	
6 Does Part VI apply? If "Yes," complete and attach Part VI	6	

	Yes	No
7 Does Part VII apply? If "Yes," complete and attach Part VII	7	
8 Does Part VIII apply? If "Yes," complete and attach Part VIII	8	
9 Does Part IX apply? If "Yes," complete and attach Part IX	9	
10 Does Part X apply? If "Yes," complete and attach Part X	10	
11 Does Part XI apply? If "Yes," complete and attach Part XI	11	
12 Reserved for future use	12	

Part I Partnership's Other Current Year International Information

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

- ☐ 1. Gain on personal property sale ☐ 5. High-taxed income ☐ 8. Form 5471 information ☐ 11. Dual consolidated loss
☐ 2. Foreign oil and gas taxes ☐ 6. Section 267A disallowed deduction ☐ 9. Other forms ☐ 12. Reserved for future use
☐ 3. Splitter arrangements ☐ 7. Reserved for future use ☐ 10. Partner loan transactions ☐ 13. Other international items
☐ 4. Foreign tax translation (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 _____)		
1 Sales							
A _____							
B _____							
C _____							
2 Gross income from performance of services							
A _____							
B _____							
C _____							
3 Gross rental real estate income							
A _____							
B _____							
C _____							
4 Other gross rental income							
A _____							
B _____							
C _____							

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 73927C

Schedule K-2 (Form 1065) 2023

**SCHEDULE K-2
(Form 1065)**Department of the Treasury
Internal Revenue Service**Partners' Distributive Share Items—International**Attach to Form 1065.
Go to www.irs.gov/Form1065 for instructions and the latest information.

OMB No. 1545-0123

2023

Name of partnership _____

Employer identification number (EIN) _____

A Is the partnership a withholding foreign partnership?☐ **Yes** ☐ **No** If "Yes," enter your WP-EIN: _____**B** Is the partnership (including the home office or any branch) a qualified derivatives dealer?☐ **Yes** ☐ **No** If "Yes," enter your QI-EIN: _____**C** Check to indicate the parts of Schedule K-2 that apply.

	Yes	No
1 Does Part I apply? If "Yes," complete and attach Part I		
2 Does Part II apply? If "Yes," complete and attach Part II		
3 Does Part III apply? If "Yes," complete and attach Part III		
4 Does Part IV apply? If "Yes," complete and attach Part IV		
5 Does Part V apply? If "Yes," complete and attach Part V		
6 Does Part VI apply? If "Yes," complete and attach Part VI		

	Yes	No
7 Does Part VII apply? If "Yes," complete and attach Part VII		
8 Does Part VIII apply? If "Yes," complete and attach Part VIII		
9 Does Part IX apply? If "Yes," complete and attach Part IX		
10 Does Part X apply? If "Yes," complete and attach Part X		
11 Does Part XI apply? If "Yes," complete and attach Part XI		
12 Reserved for future use		

Part I 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"/> 5. High-taxed income | <input type="checkbox"/> 8. Form 5471 information | <input 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 type="checkbox"/> 12. Reserved for future use |
| <input type="checkbox"/> 3. Splitter arrangements | <input type="checkbox"/> 7. Reserved for future use | <input type="checkbox"/> 10. Partner loan transactions | <input 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 _____)		
1 Sales							
A _____							
B _____							
C _____							
2 Gross income from performance of services							
A _____							
B _____							
C _____							
3 Gross rental real estate income							
A _____							
B _____							
C _____							
4 Other gross rental income							
A _____							
B _____							
C _____							

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 73927C

Schedule K-2 (Form 1065) 2023

Schedule K-2 (Form 1065) 2023

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Name of partnership

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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 _____)		
15 Net section 1231 gain							
A							
B							
C							
16 Section 986(c) gain							
17 Section 987 gain							
18 Section 988 gain							
19 Section 951(a) inclusions							
A							
B							
C							
20 Other income (see instructions)							
A							
B							
C							
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)	763,931	24,270	115,317	31,667	882	96,185	800,348
A							
B							
C							

Schedule K-2 (Form 1065) 2023

Schedule K-2 (Form 1065) 2023

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Name of partnership

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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 _____)		
15 Net section 1231 gain							
A							
B							
C							
16 Section 986(c) gain							
17 Section 987 gain							
18 Section 988 gain							
19 Section 951(a) inclusions							
A							
B							
C							
20 Other income (see instructions)							
A							
B							
C							
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)	9,225,141,606	344,662,036	442,339,551	174,933,439	965,371	3,532,061,143	13,720,455,869
A							
B							
C							

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Name of partnership

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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 _____)		
46 Section 986(c) loss							
47 Section 987 loss							
48 Section 988 loss							
49 Other allocable deductions (see instructions)							
50 Other apportioned share of deductions (see instructions)							
51 Reserved for future use							
52 Reserved for future use							
53 Reserved for future use							
54 Total deductions (combine lines 25 through 53)	799,479	21,264	52,733	25,369	994	181,174	845,110
55 Net income (loss) (subtract line 54 from line 24)							

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: _____							
B SIC code: _____							
C SIC code: _____							
D SIC code: _____							
E SIC code: _____							
F SIC code: _____							
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: _____						2A(i)	
(ii) SIC code: _____						2A(ii)	
(iii) SIC code: _____						2A(iii)	
B R&E expense with respect to activity performed outside the United States							
(i) SIC code: _____						2B(i)	
(ii) SIC code: _____						2B(ii)	
(iii) SIC code: _____						2B(iii)	

Schedule K-2 (Form 1065) 2022

Schedule K-2 (Form 1065) 2023

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Name of partnership

EIN

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 _____)		
46 Section 986(c) loss							
47 Section 987 loss							
48 Section 988 loss							
49 Other allocable deductions (see instructions)							
50 Other apportioned share of deductions (see instructions)							
51 Reserved for future use							
52 Reserved for future use							
53 Reserved for future use							
54 Total deductions (combine lines 25 through 53)	7,907,580,169	311,347,075	156,940,310	114,707,035	2,390,861	3,524,482,679	12,017,364,203
55 Net income (loss) (subtract line 54 from line 24)							

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: _____							
B SIC code: _____							
C SIC code: _____							
D SIC code: _____							
E SIC code: _____							
F SIC code: _____							
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: _____						2A(i)	
(ii) SIC code: _____						2A(ii)	
(iii) SIC code: _____						2A(iii)	
B R&E expense with respect to activity performed outside the United States							
(i) SIC code: _____						2B(i)	
(ii) SIC code: _____						2B(ii)	
(iii) SIC code: _____						2B(iii)	

Schedule K-2 (Form 1065) 2023

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Name of partnership

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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 type="checkbox"/> Accrued						
A						
B						
C						
D						
E						
F						
2 Reduction of taxes (total)					490	
A Taxes on foreign mineral income					**sum of 2a-g, all columns	
B Reserved for future use						
C International boycott provisions						
D Failure-to-file penalties						
E Taxes with respect to splitter arrangements						
F Taxes on foreign corporate distributions						
G Other						
3 Foreign tax redeterminations						
A						
Related tax year:						
Date tax paid:						
Contested tax <input type="checkbox"/>						
B						
Related tax year:						
Date tax paid:						
Contested tax <input type="checkbox"/>						
C						
Related tax year:						
Date tax paid:						
Contested tax <input type="checkbox"/>						
4 Reserved for future use						
5 Reserved for future use						
6 Reserved for future use						

Schedule K-2 (Form 1065) 2023

Schedule K-2 (Form 1065) 2023

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Name of partnership

EIN

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 type="checkbox"/> Accrued						
A						
B						
C						
D						
E						
F						
2 Reduction of taxes (total)					-146,715	
A Taxes on foreign mineral income					**sum of 2a-g, all columns	
B Reserved for future use						
C International boycott provisions						
D Failure-to-file penalties						
E Taxes with respect to splitter arrangements						
F Taxes on foreign corporate distributions						
G Other						
3 Foreign tax redeterminations						
A						
Related tax year:						
Date tax paid:						
Contested tax <input type="checkbox"/>						
B						
Related tax year:						
Date tax paid:						
Contested tax <input type="checkbox"/>						
C						
Related tax year:						
Date tax paid:						
Contested tax <input type="checkbox"/>						
4 Reserved for future use						
5 Reserved for future use						
6 Reserved for future use						

Schedule K-2 (Form 1065) 2023

**SCHEDULE B-1
(Form 1065)**(Rev. August 2019)
Department of the Treasury
Internal Revenue Service**Information on Partners Owning 50% or
More of the Partnership**

▶ Attach to Form 1065.

▶ Go to www.irs.gov/Form1065 for the latest information.

OMB No. 1545-0123

Name of partnership

Employer identification number (EIN)

TOTAL SCHEDULES B-1 FILED: 3,233,520**TOTAL SCHEDULES B-1 E-FILED: 3,127,797****Part I** **Entities Owning 50% or More of the Partnership** (Form 1065, Schedule B, Question 2a (Question 3a for 2009 through 2017))

Complete columns (i) through (v) below for any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, tax-exempt organization, or any foreign government that owns, directly or indirectly, an interest of 50% or more in the profit, loss, or capital of the partnership (see instructions).

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Type of Entity	(iv) Country of Organization	(v) Maximum Percentage Owned in Profit, Loss, or Capital
		1,057,200 ^[2]		

Part II **Individuals or Estates Owning 50% or More of the Partnership** (Form 1065, Schedule B, Question 2b (Question 3b for 2009 through 2017))

Complete columns (i) through (iv) below for any individual or estate that owns, directly or indirectly, an interest of 50% or more in the profit, loss, or capital of the partnership (see instructions).

(i) Name of Individual or Estate	(ii) Identifying Number (if any)	(iii) Country of Citizenship (see instructions)	(iv) Maximum Percentage Owned in Profit, Loss, or Capital
		5,059,592 ^[2]	

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 49842K

Schedule B-1 (Form 1065) (Rev. 8-2019)

[2] The counts on this page represent the sum of the number of rows filed rather than the number of forms which have Part I or Part II completed.

Name of partnership

Information on Partners Owning 50% or More of the Partnership

► Attach to Form 1065.

► Go to www.irs.gov/Form1065 for the latest information.

OMB No. 1545-0123

Employer identification number (EIN)	
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Part I **Entities Owning 50% or More of the Partnership** (Form 1065, Schedule B, Question 2a (Question 3a for 2009 through 2017))

Complete columns (i) through (v) below for any foreign or domestic corporation, partnership (including any entity treated as a partnership), trust, tax-exempt organization, or any foreign government that owns, directly or indirectly, an interest of 50% or more in the profit, loss, or capital of the partnership (see instructions).

(i) Name of Entity	(ii) Employer Identification Number (if any)	(iii) Type of Entity	(iv) Country of Organization	(v) Maximum Percentage Owned in Profit, Loss, or Capital
No money amounts are present on this form				

Part II **Individuals or Estates Owning 50% or More of the Partnership** (Form 1065, Schedule B, Question 2b (Question 3b for 2009 through 2017))

Complete columns (i) through (iv) below for any individual or estate that owns, directly or indirectly, an interest of 50% or more in the profit, loss, or capital of the partnership (see instructions).

[illegible]

TOTAL SCHEDULES D FILED: 401,383

TOTAL SCHEDULES D E-FILED: 394,482

**SCHEDULE D
(Form 1065)****Capital Gains and Losses**

OMB No. 1545-0123

Department of the Treasury
Internal Revenue Service

Attach to Form 1065 or Form 8865.
Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.
Go to www.irs.gov/Form1065 for instructions and the latest information.

2023

Name of partnership

Employer identification number

Did the partnership dispose of any investment(s) in a qualified opportunity fund during the tax year? ☐ Yes ☐ No
If "Yes," attach Form 8949 and see its instructions for additional requirements for reporting your gain or loss. **136** **398,197**

Part I Short-Term Capital Gains and Losses—Generally Assets Held One Year or Less (see instructions)

See instructions for how to figure the amounts to enter on the lines below.

This form may be easier to complete if you round off cents to whole dollars.

	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
1a Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b				25,921
1b Totals for all transactions reported on Form(s) 8949 with Box A checked				81,966
2 Totals for all transactions reported on Form(s) 8949 with Box B checked				23,440
3 Totals for all transactions reported on Form(s) 8949 with Box C checked				31,582
4 Short-term capital gain from installment sales from Form 6252, line 26 or 37			4	3,939
5 Short-term capital gain or (loss) from like-kind exchanges from Form 8824			5	[d]
6 Partnership's share of net short-term capital gain (loss), including specially allocated short-term capital gains (losses), from other partnerships, estates, and trusts			6	94,019
7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column (h). Enter here and on Form 1065, Schedule K, line 8 or 11; or Form 8865, Schedule K, line 8 or 11			7	215,132

Part II Long-Term Capital Gains and Losses—Generally Assets Held More Than One Year (see instructions)

See instructions for how to figure the amounts to enter on the lines below.

This form may be easier to complete if you round off cents to whole dollars.

	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b	32,257	33,126		34,124
8b Totals for all transactions reported on Form(s) 8949 with Box D checked	95,335	93,664		97,930
9 Totals for all transactions reported on Form(s) 8949 with Box E checked	53,773	48,987		53,017
10 Totals for all transactions reported on Form(s) 8949 with Box F checked	70,586	66,884		89,906
11 Long-term capital gain from installment sales from Form 6252, line 26 or 37			11	18,053
12 Long-term capital gain or (loss) from like-kind exchanges from Form 8824			12	*158
13 Partnership's share of net long-term capital gain (loss), including specially allocated long-term capital gains (losses), from other partnerships, estates, and trusts			13	152,391
14 Capital gain distributions (see instructions)			14	65,462
15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column (h). Enter here and on Form 1065, Schedule K, line 9a or 11; or Form 8865, Schedule K, line 9a or 11			15	352,281

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 11393G

Schedule D (Form 1065) 2023

**SCHEDULE D
(Form 1065)**Department of the Treasury
Internal Revenue Service**Capital Gains and Losses**

Attach to Form 1065 or Form 8865.

Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.

Go to www.irs.gov/Form1065 for instructions and the latest information.

OMB No. 1545-0123

2023

Name of partnership

Employer identification number

Did the partnership dispose of any investment(s) in a qualified opportunity fund during the tax year? ☐ Yes ☐ No
 If "Yes," attach Form 8949 and see its instructions for additional requirements for reporting your gain or loss.

Part I Short-Term Capital Gains and Losses—Generally Assets Held One Year or Less (see instructions)

See instructions for how to figure the amounts to enter on the lines below.

This form may be easier to complete if you round off cents to whole dollars.

	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part I, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
1a Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b				1,549,237
1b Totals for all transactions reported on Form(s) 8949 with Box A checked				254,976
2 Totals for all transactions reported on Form(s) 8949 with Box B checked				350,616
3 Totals for all transactions reported on Form(s) 8949 with Box C checked				70,741,728
4 Short-term capital gain from installment sales from Form 6252, line 26 or 37			4	461,754
5 Short-term capital gain or (loss) from like-kind exchanges from Form 8824			5	[d]
6 Partnership's share of net short-term capital gain (loss), including specially allocated short-term capital gains (losses), from other partnerships, estates, and trusts			6	26,594,268
7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column (h). Enter here and on Form 1065, Schedule K, line 8 or 11; or Form 8865, Schedule K, line 8 or 11			7	99,947,937

Part II Long-Term Capital Gains and Losses—Generally Assets Held More Than One Year (see instructions)

See instructions for how to figure the amounts to enter on the lines below.

This form may be easier to complete if you round off cents to whole dollars.

	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gain or loss from Form(s) 8949, Part II, line 2, column (g)	(h) Gain or (loss) Subtract column (e) from column (d) and combine the result with column (g)
8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b	30,953,896	25,520,276		5,552,080
8b Totals for all transactions reported on Form(s) 8949 with Box D checked	161,481,879	152,311,438		22,031,589
9 Totals for all transactions reported on Form(s) 8949 with Box E checked	79,929,886	50,580,192		30,176,200
10 Totals for all transactions reported on Form(s) 8949 with Box F checked	1,314,235,361	1,106,596,131		227,785,990
11 Long-term capital gain from installment sales from Form 6252, line 26 or 37			11	50,598,781
12 Long-term capital gain or (loss) from like-kind exchanges from Form 8824			12	*499,247
13 Partnership's share of net long-term capital gain (loss), including specially allocated long-term capital gains (losses), from other partnerships, estates, and trusts			13	299,884,922
14 Capital gain distributions (see instructions)			14	10,366,464
15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column (h). Enter here and on Form 1065, Schedule K, line 9a or 11; or Form 8865, Schedule K, line 9a or 11			15	646,476,681

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 11393G

Schedule D (Form 1065) 2023

TOTAL FORMS 1125-A FILED: 838,265

TOTAL FORMS 1125-A E-FILED: 801,092

Form **1125-A**(Rev. November 2018)
Department of the Treasury
Internal Revenue Service**Cost of Goods Sold**

OMB No. 1545-0123

▶ **Attach to Form 1120, 1120-C, 1120-F, 1120S, or 1065.**
▶ **Go to www.irs.gov/Form1125A for the latest information.**

Name

Employer identification number

1	Inventory at beginning of year	1	292,921	
2	Purchases	2	597,208	
3	Cost of labor	3	154,464	
4	Additional section 263A costs (attach schedule)	4	21,214	
5	Other costs (attach schedule)	5	373,708	
6	Total. Add lines 1 through 5	6	816,497	
7	Inventory at end of year	7	295,793	
8	Cost of goods sold. Subtract line 7 from line 6. Enter here and on Form 1120, page 1, line 2 or the appropriate line of your tax return. See instructions	8		

9a Check all methods used for valuing closing inventory:**302,592** (i) ☐ Cost**62,197** (ii) ☐ Lower of cost or market**8,295** (iii) ☐ Other (Specify method used and attach explanation.) ▶**8,286****b** Check if there was a writedown of subnormal goods **3,061** ▶ ☐**c** Check if the LIFO inventory method was adopted this tax year for any goods (if checked, attach Form 970) **180** ▶ ☐**d** If the LIFO inventory method was used for this tax year, enter amount of closing inventory computed under LIFO **9d** **1,928****e** If property is produced or acquired for resale, do the rules of section 263A apply to the entity? See instructions . . . ☐ Yes ☐ No**f** Was there any change in determining quantities, cost, or valuations between opening and closing inventory? If "Yes," attach explanation ☐ Yes ☐ No**23,105** **489,086****228** **379,841**

Section references are to the Internal Revenue Code unless otherwise noted.

What's New**Small business taxpayers.** For tax years beginning after December 31, 2017, the following apply.

- A small business taxpayer (defined below), may use a method of accounting for inventories that either: (1) treats inventories as nonincidental materials and supplies, or (2) conforms to the taxpayer's financial accounting treatment of inventories.
- A small business taxpayer is not required to capitalize costs under section 263A.

General Instructions**Purpose of Form**

Use Form 1125-A to calculate and deduct cost of goods sold for certain entities.

Who Must File

Filers of Form 1120, 1120-C, 1120-F, 1120S, or 1065, must complete and attach Form 1125-A if the applicable entity reports a deduction for cost of goods sold.

Inventories

Generally, inventories are required at the beginning and end of each tax year if the production, purchase, or sale of

merchandise is an income-producing factor. See Regulations section 1.471-1. If inventories are required, you generally must use an accrual method of accounting for sales and purchases of inventory items.

Exception for certain taxpayers. A small business taxpayer (defined below), can adopt or change its accounting method to account for inventories in the same manner as material and supplies that are non-incidental, or conform to its treatment of inventories in an applicable financial statement (as defined in section 451(b)(3)), or if it does not have an applicable financial statement, the method of accounting used in its books and records prepared in accordance with its accounting procedures. See section 471(c)(3).

A small business taxpayer claiming exemption from the requirement to keep inventories is changing its method of accounting for purposes of section 481. For additional guidance on this method of accounting, see Pub. 538, Accounting Periods and Methods. For guidance on changing to this method of accounting, see Form 3115 and the Instructions for Form 3115.

Small business taxpayer. A small

business taxpayer is a taxpayer that (a) has average annual gross receipts of \$25 million or less (indexed for inflation) for the 3 prior tax years, and (b) is not a tax shelter (as defined in section 448(d)(3)). See Pub. 538.

Uniform capitalization rules. The uniform capitalization rules of section 263A generally require you to capitalize, or include in inventory, certain costs incurred in connection with the following.

- The production of real property and tangible personal property held in inventory or held for sale in the ordinary course of business.
- Real property or personal property (tangible and intangible) acquired for resale.
- The production of real property and tangible personal property for use in its trade or business or in an activity engaged in for profit.

A small business taxpayer (defined above) is not required to capitalize costs under section 263A. See section 263A(i).

See the discussion on section 263A uniform capitalization rules in the instructions for your tax return before completing Form 1125-A. Also see Regulations sections 1.263A-1 through 1.263A-3. See Regulations section 1.263A-4 for rules for property produced in a farming business.

Form 1125-A (Rev. November 2018) Department of the Treasury Internal Revenue Service	Cost of Goods Sold ► Attach to Form 1120, 1120-C, 1120-F, 1120S, or 1065. ► Go to www.irs.gov/Form1125A for the latest information.	OMB No. 1545-0123
Name		Employer identification number
1 Inventory at beginning of year		1 468,139,736
2 Purchases		2 2,913,832,965
3 Cost of labor		3 268,791,589
4 Additional section 263A costs (attach schedule)		4 28,047,908
5 Other costs (attach schedule)		5 1,221,279,614
6 Total. Add lines 1 through 5		6 4,900,091,813
7 Inventory at end of year		7 477,720,141
8 Cost of goods sold. Subtract line 7 from line 6. Enter here and on Form 1120, page 1, line 2 or the appropriate line of your tax return. See instructions		8
9a Check all methods used for valuing closing inventory:		
(i) <input type="checkbox"/> Cost		
(ii) <input type="checkbox"/> Lower of cost or market		
(iii) <input type="checkbox"/> Other (Specify method used and attach explanation.) ►		
b Check if there was a writedown of subnormal goods <input type="checkbox"/>		
c Check if the LIFO inventory method was adopted this tax year for any goods (if checked, attach Form 970) <input type="checkbox"/>		
d If the LIFO inventory method was used for this tax year, enter amount of closing inventory computed under LIFO		9d 42,156,539
e If property is produced or acquired for resale, do the rules of section 263A apply to the entity? See instructions . . . <input type="checkbox"/> Yes <input type="checkbox"/> No		
f Was there any change in determining quantities, cost, or valuations between opening and closing inventory? If "Yes," attach explanation <input type="checkbox"/> Yes <input type="checkbox"/> No		

Section references are to the Internal Revenue Code unless otherwise noted.

What's New

Small business taxpayers. For tax years beginning after December 31, 2017, the following apply.

- A small business taxpayer (defined below), may use a method of accounting for inventories that either: (1) treats inventories as nonincidental materials and supplies, or (2) conforms to the taxpayer's financial accounting treatment of inventories.
- A small business taxpayer is not required to capitalize costs under section 263A.

General Instructions

Purpose of Form

Use Form 1125-A to calculate and deduct cost of goods sold for certain entities.

Who Must File

Filers of Form 1120, 1120-C, 1120-F, 1120S, or 1065, must complete and attach Form 1125-A if the applicable entity reports a deduction for cost of goods sold.

Inventories

Generally, inventories are required at the beginning and end of each tax year if the production, purchase, or sale of

merchandise is an income-producing factor. See Regulations section 1.471-1. If inventories are required, you generally must use an accrual method of accounting for sales and purchases of inventory items.

Exception for certain taxpayers. A small business taxpayer (defined below), can adopt or change its accounting method to account for inventories in the same manner as material and supplies that are non-incidental, or conform to its treatment of inventories in an applicable financial statement (as defined in section 451(b)(3)), or if it does not have an applicable financial statement, the method of accounting used in its books and records prepared in accordance with its accounting procedures. See section 471(c)(3).

A small business taxpayer claiming exemption from the requirement to keep inventories is changing its method of accounting for purposes of section 481. For additional guidance on this method of accounting, see Pub. 538, Accounting Periods and Methods. For guidance on changing to this method of accounting, see Form 3115 and the Instructions for Form 3115.

Small business taxpayer. A small business taxpayer is a taxpayer that (a) has average annual gross receipts of \$25 million or less (indexed for inflation) for the 3 prior tax years, and (b) is not a tax shelter (as defined in section 448(d)(3)). See Pub. 538.

Uniform capitalization rules. The uniform capitalization rules of section 263A generally require you to capitalize, or include in inventory, certain costs incurred in connection with the following.

- The production of real property and tangible personal property held in inventory or held for sale in the ordinary course of business.
- Real property or personal property (tangible and intangible) acquired for resale.
- The production of real property and tangible personal property for use in its trade or business or in an activity engaged in for profit.

A small business taxpayer (defined above) is not required to capitalize costs under section 263A. See section 263A(i).

See the discussion on section 263A uniform capitalization rules in the instructions for your tax return before completing Form 1125-A. Also see Regulations sections 1.263A-1 through 1.263A-3. See Regulations section 1.263A-4 for rules for property produced in a farming business.

**SCHEDULE M-3
(Form 1065)**(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Net Income (Loss) Reconciliation
for Certain Partnerships**

▶ Attach to Form 1065.

▶ Go to www.irs.gov/Form1065 for instructions and the latest information.

OMB No. 1545-0123

Name of partnership

TOTAL SCHEDULES M-3 FILED: 532,558**TOTAL SCHEDULES M-3' E-FILED: 525,371**

Employer identification number

This Schedule M-3 is being filed because (check all that apply):

- 326,897** ☐ **A** The amount of the partnership's total assets at the end of the tax year is equal to \$10 million or more.
- 393,177** ☐ **B** The amount of the partnership's adjusted total assets for the tax year is equal to \$10 million or more. If box B is checked, enter the amount of adjusted total assets for the tax year **392,902**
- 40,383** ☐ **C** The amount of total receipts for the tax year is equal to \$35 million or more. If box C is checked, enter the total receipts for the tax year **40,297**
- 199,145** ☐ **D** An entity that is a reportable entity partner with respect to the partnership owns or is deemed to own an interest of 50% or more in the partnership's capital, profit, or loss on any day during the tax year of the partnership.

Name of Reportable Entity Partner	Identifying Number	Maximum Percentage Owned or Deemed Owned
204,479	204,479	201,402
33,035	33,035	32,953

36,500 ☐ Voluntary filer.**Part I Financial Information and Net Income (Loss) Reconciliation**

- 1a** Did the partnership file SEC Form 10-K for its income statement period ending with or within this tax year?
681 ☐ **Yes.** Skip lines 1b and 1c and complete lines 2 through 11 with respect to that SEC Form 10-K.
- 502,664** ☐ **No.** Go to line 1b. See instructions if multiple non-tax-basis income statements are prepared.
- b** Did the partnership prepare a certified audited non-tax-basis income statement for that period?
119,375 ☐ **Yes.** Skip line 1c and complete lines 2 through 11 with respect to that income statement.
- 380,428** ☐ **No.** Go to line 1c.
- c** Did the partnership prepare a non-tax-basis income statement for that period?
148,715 ☐ **Yes.** Complete lines 2 through 11 with respect to that income statement.
- 234,968** ☐ **No.** Skip lines 2 through 3b and enter the partnership's net income (loss) per its books and records on line 4a.
- 2** Enter the income statement period: Beginning **309,779** / Ending **309,770** /
- 3a** Has the partnership's income statement been restated for the income statement period on line 2?
57 ☐ **Yes.** (If "Yes," attach a statement and the amount of each item restated.)
- 310,144** ☐ **No.**
- b** Has the partnership's income statement been restated for any of the 5 income statement periods immediately preceding the period on line 2?
507 ☐ **Yes.** (If "Yes," attach a statement and the amount of each item restated.)
- 310,034** ☐ **No.**
- | | | |
|---|-----------|----------------|
| 4a Worldwide consolidated net income (loss) from income statement source identified on Part I, line 1 | 4a | 524,398 |
| b Indicate accounting standard used for line 4a. See instructions. | | |
| 263,974 1 <input type="checkbox"/> GAAP 4,215 2 <input type="checkbox"/> IFRS 7,268 3 <input type="checkbox"/> Section 704(b) | | |
| 136,692 4 <input type="checkbox"/> Tax-basis 25,627 5 <input type="checkbox"/> Other (specify) ▶ 25,671 | | |
| 5a Net income from nonincludible foreign entities (attach statement) | 5a | (1,416) |
| b Net loss from nonincludible foreign entities (attach statement and enter as a positive amount) | 5b | 1,120 |
| 6a Net income from nonincludible U.S. entities (attach statement) | 6a | (7,769) |
| b Net loss from nonincludible U.S. entities (attach statement and enter as a positive amount) | 6b | 5,420 |
| 7a Net income (loss) of other foreign disregarded entities (attach statement) | 7a | 161 |
| b Net income (loss) of other U.S. disregarded entities (attach statement) | 7b | 446 |
| 8 Adjustment to eliminations of transactions between includible entities and nonincludible entities (attach statement) | 8 | 2,812 |
| 9 Adjustment to reconcile income statement period to tax year (attach statement) | 9 | 1,723 |
| 10 Other adjustments to reconcile to amount on line 11 (attach statement) | 10 | 6,240 |
| 11 Net income (loss) per income statement of the partnership. Combine lines 4a through 10 | 11 | 524,411 |
- Note:** Part I, line 11, must equal Part II, line 26, column (a); or Form 1065, Schedule M-1, line 1. See instructions.

12 Enter the total amount (not just the partnership's share) of the assets and liabilities of all entities included or removed on the following lines.

	Total Assets	Total Liabilities
a Included on Part I, line 4	499,862	437,749
b Removed on Part I, line 5	1,682	1,634
c Removed on Part I, line 6	9,057	8,857
d Included on Part I, line 7	563	578

For Paperwork Reduction Act Notice, see the instructions for your return.

Cat. No. 39669D

Schedule M-3 (Form 1065) (Rev. 12-2021)

**SCHEDULE M-3
(Form 1065)**(Rev. December 2021)
Department of the Treasury
Internal Revenue Service**Net Income (Loss) Reconciliation
for Certain Partnerships**

▶ Attach to Form 1065.

▶ Go to www.irs.gov/Form1065 for instructions and the latest information.

OMB No. 1545-0123

Name of partnership

Employer identification number

This Schedule M-3 is being filed because (check all that apply):

- A** ☐ The amount of the partnership's total assets at the end of the tax year is equal to \$10 million or more.
- B** ☐ The amount of the partnership's adjusted total assets for the tax year is equal to \$10 million or more. If box B is checked, enter the amount of adjusted total assets for the tax year **67,393,196,447**.
- C** ☐ The amount of total receipts for the tax year is equal to \$35 million or more. If box C is checked, enter the total receipts for the tax year **9,548,289,148**.
- D** ☐ An entity that is a reportable entity partner with respect to the partnership owns or is deemed to own an interest of 50% or more in the partnership's capital, profit, or loss on any day during the tax year of the partnership.

Name of Reportable Entity Partner	Identifying Number	Maximum Percentage Owned or Deemed Owned

E ☐ Voluntary filer.**Part I Financial Information and Net Income (Loss) Reconciliation**

- 1a** Did the partnership file SEC Form 10-K for its income statement period ending with or within this tax year?
☐ **Yes.** Skip lines 1b and 1c and complete lines 2 through 11 with respect to that SEC Form 10-K.
☐ **No.** Go to line 1b. See instructions if multiple non-tax-basis income statements are prepared.
- b** Did the partnership prepare a certified audited non-tax-basis income statement for that period?
☐ **Yes.** Skip line 1c and complete lines 2 through 11 with respect to that income statement.
☐ **No.** Go to line 1c.
- c** Did the partnership prepare a non-tax-basis income statement for that period?
☐ **Yes.** Complete lines 2 through 11 with respect to that income statement.
☐ **No.** Skip lines 2 through 3b and enter the partnership's net income (loss) per its books and records on line 4a.
- 2** Enter the income statement period: Beginning ____ / ____ / ____ Ending ____ / ____ / ____
- 3a** Has the partnership's income statement been restated for the income statement period on line 2?
☐ **Yes.** (If "Yes," attach a statement and the amount of each item restated.)
☐ **No.**
- b** Has the partnership's income statement been restated for any of the 5 income statement periods immediately preceding the period on line 2?
☐ **Yes.** (If "Yes," attach a statement and the amount of each item restated.)
☐ **No.**

4a Worldwide consolidated net income (loss) from income statement source identified on Part I, line 1	4a	2,513,848,436
b Indicate accounting standard used for line 4a. See instructions. 1 <input type="checkbox"/> GAAP 2 <input type="checkbox"/> IFRS 3 <input type="checkbox"/> Section 704(b) 4 <input type="checkbox"/> Tax-basis 5 <input type="checkbox"/> Other (specify) ▶ _____		
5a Net income from nonincludible foreign entities (attach statement)	5a	(58,979,236)
b Net loss from nonincludible foreign entities (attach statement and enter as a positive amount)	5b	42,422,268
6a Net income from nonincludible U.S. entities (attach statement)	6a	(243,112,414)
b Net loss from nonincludible U.S. entities (attach statement and enter as a positive amount)	6b	362,206,267
7a Net income (loss) of other foreign disregarded entities (attach statement)	7a	-5,912,517
b Net income (loss) of other U.S. disregarded entities (attach statement)	7b	-30,027,523
8 Adjustment to eliminations of transactions between includible entities and nonincludible entities (attach statement)	8	24,745,391
9 Adjustment to reconcile income statement period to tax year (attach statement)	9	-6,587,081
10 Other adjustments to reconcile to amount on line 11 (attach statement)	10	-1,243,545
11 Net income (loss) per income statement of the partnership. Combine lines 4a through 10	11	2,597,586,972
Note: Part I, line 11, must equal Part II, line 26, column (a); or Form 1065, Schedule M-1, line 1. See instructions.		

12 Enter the total amount (not just the partnership's share) of the assets and liabilities of all entities included or removed on the following lines.

	Total Assets	Total Liabilities
a Included on Part I, line 4	58,903,600,226	22,465,490,950
b Removed on Part I, line 5	910,091,459	294,902,893
c Removed on Part I, line 6	4,571,345,868	1,952,764,173
d Included on Part I, line 7	284,799,207	148,726,915

For Paperwork Reduction Act Notice, see the instructions for your return.

Cat. No. 39669D

Schedule M-3 (Form 1065) (Rev. 12-2021)

Schedule M-3 (Form 1065) (Rev. 12-2021)

Page **2**

Name of partnership

Employer identification number

Part II Reconciliation of Net Income (Loss) per Income Statement of Partnership With Income (Loss) per Return

Income (Loss) Items		(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
Attach statements for lines 1 through 10.					
1	Income (loss) from equity method foreign corporations	624	500	114	
2	Gross foreign dividends not previously taxed	6,210	5,979	135	9,269
3	Subpart F, QEF, and similar income inclusions		5,060	222	5,273
4	Gross foreign distributions previously taxed	48	45	21	
5	Income (loss) from equity method U.S. corporations	1,223	1,097	139	
6	U.S. dividends	37,379	15,316	5,041	38,929
7	Income (loss) from U.S. partnerships	74,228	71,178	52,904	108,650
8	Income (loss) from foreign partnerships	10,117	15,812	3,978	19,015
9	Income (loss) from other pass-through entities	2,875	2,724	1,456	4,475
10	Items relating to reportable transactions	738	1,206	181	1,862
11	Interest income (see instructions)	159,322	15,144	8,786	157,896
12	Total accrual to cash adjustment	2,747	4,169	[d]	3,298
13	Hedging transactions	1,467	1,291	*9	792
14	Mark-to-market income (loss)	5,687	4,853	231	1,304
15	Cost of goods sold (see instructions)	(31,450)	13,647	2,445	(31,503)
16	Sale versus lease (for sellers and/or lessors)	43	35	0	37
17	Section 481(a) adjustments		2,885	55	2,939
18	Unearned/deferred revenue	8,599	20,092	*241	17,649
19	Income recognition from long-term contracts	1,183	431	102	1,157
20	Original issue discount and other imputed interest	502	861	57	1,028
21a	Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities	73,673	68,521	4,825	
b	Gross capital gains from Schedule D, excluding amounts from pass-through entities		33,880	2,947	36,411
c	Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		19,972	3,349	23,147
d	Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		17,445	804	18,265
e	Abandonment losses		576	22	595
f	Worthless stock losses (attach statement)		776	*73	849
g	Other gain/loss on disposition of assets other than inventory		16,326	611	16,934
22	Other income (loss) items with differences (attach statement)	108,720	105,654	9,396	55,633
23	Total income (loss) items. Combine lines 1 through 22	256,257	189,551	71,396	259,670
24	Total expense/deduction items. (From Part III, line 31) (see instructions)	216,650	158,707	93,673	221,411
25	Other items with no differences	252,412			252,395
26	Reconciliation totals. Combine lines 23 through 25	302,362	221,479	139,026	304,915

Note: Line 26, column (a), must equal Part I, line 11, and column (d) must equal Form 1065, Analysis of Net Income (Loss), line 1.

Schedule M-3 (Form 1065) (Rev. 12-2021)

Schedule M-3 (Form 1065) (Rev. 12-2021)

Page **2**

Name of partnership

Employer identification number

Part II Reconciliation of Net Income (Loss) per Income Statement of Partnership With Income (Loss) per Return

Income (Loss) Items		(a) Income (Loss) per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Income (Loss) per Tax Return
Attach statements for lines 1 through 10.					
1	Income (loss) from equity method foreign corporations	13,239,312	-12,943,019	-272,678	
2	Gross foreign dividends not previously taxed	54,490,339	8,154,493	1,248,234	63,893,237
3	Subpart F, QEF, and similar income inclusions		29,603,658	1,264,956	30,868,568
4	Gross foreign distributions previously taxed	3,674,503	-3,245	-3,635,950	
5	Income (loss) from equity method U.S. corporations	-6,956,849	6,714,580	363,813	
6	U.S. dividends	121,728,109	-4,500,447	3,300,985	120,528,647
7	Income (loss) from U.S. partnerships	401,266,418	44,354,910	3,371,927	448,972,928
8	Income (loss) from foreign partnerships	236,571,669	-23,022,542	2,001,772	214,604,345
9	Income (loss) from other pass-through entities	14,180,316	9,993,474	361,275	24,535,065
10	Items relating to reportable transactions	-21,867,762	-18,525,440	-533,125	-40,926,326
11	Interest income (see instructions)	559,464,668	-17,051,048	-4,746,239	537,324,976
12	Total accrual to cash adjustment	47,690,907	-2,941,926	[d]	44,751,350
13	Hedging transactions	13,918,930	-11,056,680	*-7,336	2,854,914
14	Mark-to-market income (loss)	101,312,503	-17,586,723	483,208	84,204,647
15	Cost of goods sold (see instructions)	(3,372,981,789)	-33,523,238	-3,446,474	(3,412,581,851)
16	Sale versus lease (for sellers and/or lessors)	251,072	746,391	0	997,464
17	Section 481(a) adjustments		3,129,762	-144,657	2,985,105
18	Unearned/deferred revenue	54,360,453	822,866	*336,170	55,494,043
19	Income recognition from long-term contracts	78,213,054	530,761	-275,081	78,468,734
20	Original issue discount and other imputed interest	1,553,458	1,466,951	-20,548	2,999,860
21a	Income statement gain/loss on sale, exchange, abandonment, worthlessness, or other disposition of assets other than inventory and pass-through entities	662,562,682	-620,224,576	-41,838,567	
b	Gross capital gains from Schedule D, excluding amounts from pass-through entities		691,255,712	38,460,145	731,380,194
c	Gross capital losses from Schedule D, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		-339,515,953	-13,382,543	-353,199,567
d	Net gain/loss reported on Form 4797, line 17, excluding amounts from pass-through entities, abandonment losses, and worthless stock losses		86,922,532	4,940,328	91,848,683
e	Abandonment losses		-1,058,922	-16,309	-1,075,127
f	Worthless stock losses (attach statement)		-6,137,458	*-42,819	-6,180,277
g	Other gain/loss on disposition of assets other than inventory		56,317,350	10,547,451	66,631,166
22	Other income (loss) items with differences (attach statement)	2,125,158,306	-578,015,542	-16,176,017	1,529,523,169
23	Total income (loss) items. Combine lines 1 through 22	1,087,153,011	-749,406,484	-17,744,509	317,231,605
24	Total expense/deduction items. (From Part III, line 31) (see instructions)	-2,218,057,326	-67,182,717	57,314,292	-2,227,006,488
25	Other items with no differences	3,599,730,421			3,599,794,749
26	Reconciliation totals. Combine lines 23 through 25	2,470,416,128	-816,172,925	39,569,818	1,692,162,368

Note: Line 26, column (a), must equal Part I, line 11, and column (d) must equal Form 1065, Analysis of Net Income (Loss), line 1.

Schedule M-3 (Form 1065) (Rev. 12-2021)

Schedule M-3 (Form 1065) (Rev. 12-2021)

Page **3**

Name of partnership

Employer identification number

Part III Reconciliation of Net Income (Loss) per Income Statement of Partnership With Income (Loss) per Return—Expense/Deduction Items

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 State and local current income tax expense	43,430	7,116	3,155	44,152
2 State and local deferred income tax expense	917	665	200	257
3 Foreign current income tax expense (other than foreign withholding taxes)	12,877	2,002	507	13,940
4 Foreign deferred income tax expense	454	211	216	65
5 Equity-based compensation	1,525	903	832	619
6 Meals and entertainment	57,800	899	56,493	55,812
7 Fines and penalties	11,687	296	11,387	839
8 Judgments, damages, awards, and similar costs	141	65	*6	159
9 Guaranteed payments	16,338	1,270	18,017	6,806
10 Pension and profit-sharing	12,491	1,041	258	12,578
11 Other post-retirement benefits	1,230	277	99	1,271
12 Deferred compensation	2,061	2,089	64	1,936
13 Charitable contribution of cash and tangible property	28,097	745	1,299	28,141
14 Charitable contribution of intangible property	156	*37	24	168
15 Organizational expenses as per Regulations section 1.709-2(a)	6,768	14,134	810	11,689
16 Syndication expenses as per Regulations section 1.709-2(b)	492	243	283	43
17 Current year acquisition/reorganization investment banking fees	109	86	25	102
18 Current year acquisition/reorganization legal and accounting fees	919	862	67	561
19 Amortization/impairment of goodwill	4,946	7,582	571	7,674
20 Amortization of acquisition, reorganization, and start- up costs	5,139	12,542	160	13,947
21 Other amortization or impairment write-offs	90,026	58,941	942	103,776
22 Reserved for future use				
23a Depletion—oil & gas	1,343	734	605	
b Depletion—other than oil & gas	152	82	110	117
24 Intangible drilling and development costs (IDC)	503	556	0	1,035
25 Depreciation	127,022	96,508	3,558	129,938
26 Bad debt expense	41,444	27,267	165	39,187
27 Interest expense (see instructions)	138,363	30,769	2,364	130,714
28 Purchase versus lease (for purchasers and/or lessees)	221	428	[d]	436
29 Research and development costs	2,183	2,553	101	1,993
30 Other expense/deduction items with differences (attach statement)	99,390	91,737	39,481	91,999
31 Total expense/deduction items. Combine lines 1 through 30. Enter here and on Part II, line 24, reporting positive amounts as negative and negative amounts as positive	216,582	158,646	93,683	221,343

Schedule M-3 (Form 1065) (Rev. 12-2021)

Schedule M-3 (Form 1065) (Rev. 12-2021)

Page **3**

Name of partnership

Employer identification number

Part III Reconciliation of Net Income (Loss) per Income Statement of Partnership With Income (Loss) per Return—Expense/Deduction Items

Expense/Deduction Items	(a) Expense per Income Statement	(b) Temporary Difference	(c) Permanent Difference	(d) Deduction per Tax Return
1 State and local current income tax expense . . .	11,591,000	1,508,528	3,339,979	16,308,091
2 State and local deferred income tax expense . . .	-11,081	139,183	-68,134	59,967
3 Foreign current income tax expense (other than foreign withholding taxes)	8,876,993	526,840	1,000,935	10,404,768
4 Foreign deferred income tax expense	-2,074,729	1,186,765	987,798	99,834
5 Equity-based compensation	15,948,726	-3,790,387	-2,743,698	9,414,641
6 Meals and entertainment	10,194,489	-36,636	-4,897,793	5,317,602
7 Fines and penalties	1,270,672	-2,342	-1,241,352	27,194
8 Judgments, damages, awards, and similar costs . .	1,036,778	-104,830	*-117,286	822,862
9 Guaranteed payments	42,621,736	2,652,822	-42,887,601	2,659,564
10 Pension and profit-sharing	16,126,949	253,368	1,889,305	18,029,879
11 Other post-retirement benefits	2,649,983	239,920	428,295	3,318,198
12 Deferred compensation	13,071,747	-388,778	-824,892	11,858,077
13 Charitable contribution of cash and tangible property	4,691,695	75,377	275,049	5,042,121
14 Charitable contribution of intangible property . . .	163,801	*3,068	16,559	183,427
15 Organizational expenses as per Regulations section 1.709-2(a)	1,456,616	-1,058,647	-179,858	214,762
16 Syndication expenses as per Regulations section 1.709-2(b)	218,763	-108,232	-142,690	-32,160
17 Current year acquisition/reorganization investment banking fees	394,417	-137,203	185,535	442,750
18 Current year acquisition/reorganization legal and accounting fees	1,745,097	-767,047	-202,975	775,075
19 Amortization/impairment of goodwill	37,482,989	-7,292,196	-6,956,996	22,417,790
20 Amortization of acquisition, reorganization, and start- up costs	3,091,099	463,622	-9,753	3,543,927
21 Other amortization or impairment write-offs	110,242,584	-11,311,691	-268,841	98,669,850
22 Reserved for future use				
23a Depletion—oil & gas	15,838,954	-14,481,714	-1,234,117	
b Depletion—other than oil & gas	546,610	-81,454	1,321,890	1,787,047
24 Intangible drilling and development costs (IDC) . .	7,883,546	35,126,625	0	43,010,170
25 Depreciation	288,026,095	89,025,660	805,763	377,926,482
26 Bad debt expense	29,912,206	-3,471,684	-28,464	26,408,571
27 Interest expense (see instructions)	619,194,560	-40,184,048	-2,217,682	576,776,693
28 Purchase versus lease (for purchasers and/or lessees)	92,705	539,747	[d]	492,860
29 Research and development costs	31,188,836	-27,602,168	120,003	3,689,656
30 Other expense/deduction items with differences (attach statement)	944,076,823	46,590,178	-3,511,222	987,135,487
31 Total expense/deduction items. Combine lines 1 through 30. Enter here and on Part II, line 24, reporting positive amounts as negative and negative amounts as positive	2,217,599,186	67,501,999	-57,301,836	2,226,878,373

Schedule M-3 (Form 1065) (Rev. 12-2021)

TOTAL SCHEDULES C FILED: 212,369

TOTAL SCHEDULES C E-FILED: 208,901

**SCHEDULE C
(Form 1065)**(Rev. December 2014)
Department of the Treasury
Internal Revenue Service
Name of partnership**Additional Information for Schedule M-3 Filers**

► Attach to Form 1065. See separate instructions.

► Information about Schedule C (Form 1065) and its instructions is at www.irs.gov/form1065.

OMB No. 1545-0123

Employer identification number

	Yes	No
1 At any time during the tax year, were there any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8?	671	211,646
2 Does any amount reported on Schedule M-3, Part II, lines 7 or 8, column (d), reflect allocations to this partnership from another partnership of income, gain, loss, deduction, or credit that are disproportionate to this partnership's share of capital in that partnership or its ratio for sharing other items of that partnership?	5,585	206,629
3 At any time during the tax year, did the partnership sell, exchange, or transfer any interest in an intangible asset to a related person as defined in sections 267(b) and 707(b)(1)?	47	212,166
4 At any time during the tax year, did the partnership acquire any interest in an intangible asset from a related person as defined in sections 267(b) and 707(b)(1)?	36	212,202
5 At any time during the tax year, did the partnership make any change in accounting principle for financial accounting purposes? See instructions for a definition of change in accounting principle	693	211,549
6 At any time during the tax year, did the partnership make any change in a method of accounting for U.S. income tax purposes?	1,039	211,178

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 49945S

Schedule C (Form 1065) (Rev. 12-2014)

**SCHEDULE C
(Form 1065)**

(Rev. December 2014)

Department of the Treasury
Internal Revenue Service**Additional Information for Schedule M-3 Filers**

► Attach to Form 1065. See separate instructions.

OMB No. 1545-0123

► Information about Schedule C (Form 1065) and its instructions is at www.irs.gov/form1065.

Name of partnership

Employer identification number

	Yes	No
1 At any time during the tax year, were there any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8?		
2 Does any amount reported on Schedule M-3, Part II, lines 7 or 8, column (d), reflect allocations to this partnership from another partnership of income, gain, loss, deduction, or credit that are disproportionate to this partnership's share of capital in that partnership or its ratio for sharing other items of that partnership?		
3 At any time during the tax year, did the partnership sell, exchange, or transfer any interest in an intangible asset to a related person as defined in sections 267(b) and 707(b)(1)?		
4 At any time during the tax year, did the partnership acquire any interest in an intangible asset from a related person as defined in sections 267(b) and 707(b)(1)?		
5 At any time during the tax year, did the partnership make any change in accounting principle for financial accounting purposes? See instructions for a definition of change in accounting principle		
6 At any time during the tax year, did the partnership make any change in a method of accounting for U.S. income tax purposes?		

For Paperwork Reduction Act Notice, see the Instructions for Form 1065.

Cat. No. 49945S

Schedule C (Form 1065) (Rev. 12-2014)

No money amounts are present on this form.

TOTAL SCHEDULES F FILED: 141,316

TOTAL SCHEDULES F E-FILED: 134,835

**SCHEDULE F
(Form 1040)**Department of the Treasury
Internal Revenue Service**Profit or Loss From Farming**Attach to Form 1040, 1040-SR, 1040-SS, 1040-NR, 1041, or 1065.
Go to www.irs.gov/ScheduleF for instructions and the latest information.

OMB No. 1545-0074

2023Attachment
Sequence No. **14**

Name of proprietor

Social security number (SSN)

A Principal crop or activity**B** Enter code from Part IV**C** Accounting method:☐ Cash ☐ Accrual**D** Employer ID number (EIN) (see instr.)**E** Did you "materially participate" in the operation of this business during 2023? If "No," see instructions for limit on passive losses ☐ Yes ☐ No**F** Did you make any payments in 2023 that would require you to file Form(s) 1099? See instructions ☐ Yes ☐ No**G** If "Yes," did you or will you file required Form(s) 1099? ☐ Yes ☐ No**Part I Farm Income—Cash Method.** Complete Parts I and II. (Accrual method. Complete Parts II and III, and Part I, line 9.)

1a Sales of purchased livestock and other resale items (see instructions)	1a	
b Cost or other basis of purchased livestock or other items reported on line 1a	1b	
c Subtract line 1b from line 1a	1c	
2 Sales of livestock, produce, grains, and other products you raised	2	
3a Cooperative distributions (Form(s) 1099-PATR)	3a	
3b Taxable amount	3b	
4a Agricultural program payments (see instructions)	4a	
4b Taxable amount	4b	
5a Commodity Credit Corporation (CCC) loans reported under election	5a	
b CCC loans forfeited	5b	
5c Taxable amount	5c	
6 Crop insurance proceeds and federal crop disaster payments (see instructions):		
a Amount received in 2023	6a	
b Taxable amount	6b	
c If election to defer to 2024 is attached, check here <input type="checkbox"/>	6d Amount deferred from 2022	
7 Custom hire (machine work) income	7	
8 Other income, including federal and state gasoline or fuel tax credit or refund (see instructions)	8	
9 Gross income. Add amounts in the right column (lines 1c, 2, 3b, 4b, 5a, 5c, 6b, 6d, 7, and 8). If you use the accrual method, enter the amount from Part III, line 50. See instructions	9	126,502

Part II Farm Expenses—Cash and Accrual Method. Do not include personal or living expenses. See instructions.

10 Car and truck expenses (see instructions). Also attach Form 4562	10		23 Pension and profit-sharing plans	23	
11 Chemicals	11		24 Rent or lease (see instructions):		
12 Conservation expenses (see instructions)	12		a Vehicles, machinery, equipment	24a	
13 Custom hire (machine work)	13		b Other (land, animals, etc.)	24b	
14 Depreciation and section 179 expense (see instructions)	14	94,343	25 Repairs and maintenance	25	
15 Employee benefit programs other than on line 23	15		26 Seeds and plants	26	
16 Feed	16		27 Storage and warehousing	27	
17 Fertilizers and lime	17		28 Supplies	28	
18 Freight and trucking	18		29 Taxes	29	
19 Gasoline, fuel, and oil	19		30 Utilities	30	
20 Insurance (other than health)	20		31 Veterinary, breeding, and medicine	31	
21 Interest (see instructions):			32 Other expenses (specify):		
a Mortgage (paid to banks, etc.)	21a	25,643	a -----	32a	
b Other	21b	29,566	b -----	32b	
22 Labor hired (less employment credits)	22		c -----	32c	
			d -----	32d	
			e -----	32e	
			f -----	32f	
33 Total expenses. Add lines 10 through 32f. If line 32f is negative, see instructions	33	138,319			
34 Net farm profit or (loss). Subtract line 33 from line 9	34				

If a profit, stop here and see instructions for where to report. If a loss, complete line 36.

35 Reserved for future use.**36** Check the box that describes your investment in this activity and see instructions for where to report your loss:**a** ☐ All investment is at risk. **b** ☐ Some investment is not at risk.

For Paperwork Reduction Act Notice, see the separate instructions.

Cat. No. 11346H

Schedule F (Form 1040) 2023

**SCHEDULE F
(Form 1040)**Department of the Treasury
Internal Revenue Service**Profit or Loss From Farming**Attach to Form 1040, 1040-SR, 1040-SS, 1040-NR, 1041, or 1065.
Go to www.irs.gov/ScheduleF for instructions and the latest information.

OMB No. 1545-0074

2023Attachment
Sequence No. **14**

Name of proprietor

Social security number (SSN)

A Principal crop or activity**B** Enter code from Part IV**C** Accounting method:☐ Cash ☐ Accrual**D** Employer ID number (EIN) (see instr.)**E** Did you "materially participate" in the operation of this business during 2023? If "No," see instructions for limit on passive losses ☐ Yes ☐ No**F** Did you make any payments in 2023 that would require you to file Form(s) 1099? See instructions ☐ Yes ☐ No**G** If "Yes," did you or will you file required Form(s) 1099? ☐ Yes ☐ No**Part I Farm Income—Cash Method.** Complete Parts I and II. (Accrual method. Complete Parts II and III, and Part I, line 9.)

1a Sales of purchased livestock and other resale items (see instructions)	1a	
b Cost or other basis of purchased livestock or other items reported on line 1a	1b	
c Subtract line 1b from line 1a		1c
2 Sales of livestock, produce, grains, and other products you raised		2
3a Cooperative distributions (Form(s) 1099-PATR)	3a	3b Taxable amount
4a Agricultural program payments (see instructions)	4a	4b Taxable amount
5a Commodity Credit Corporation (CCC) loans reported under election		5a
b CCC loans forfeited	5b	5c Taxable amount
6 Crop insurance proceeds and federal crop disaster payments (see instructions):		
a Amount received in 2023	6a	6b Taxable amount
c If election to defer to 2024 is attached, check here <input type="checkbox"/>		6d Amount deferred from 2022
7 Custom hire (machine work) income		7
8 Other income, including federal and state gasoline or fuel tax credit or refund (see instructions)		8
9 Gross income. Add amounts in the right column (lines 1c, 2, 3b, 4b, 5a, 5c, 6b, 6d, 7, and 8). If you use the accrual method, enter the amount from Part III, line 50. See instructions		9 156,948,352

Part II Farm Expenses—Cash and Accrual Method. Do not include personal or living expenses. See instructions.

10 Car and truck expenses (see instructions). Also attach Form 4562	10		23 Pension and profit-sharing plans	23
11 Chemicals	11		24 Rent or lease (see instructions):	
12 Conservation expenses (see instructions)	12		a Vehicles, machinery, equipment	24a
13 Custom hire (machine work)	13		b Other (land, animals, etc.)	24b
14 Depreciation and section 179 expense (see instructions)	14	13,911,592	25 Repairs and maintenance	25
15 Employee benefit programs other than on line 23	15		26 Seeds and plants	26
16 Feed	16		27 Storage and warehousing	27
17 Fertilizers and lime	17		28 Supplies	28
18 Freight and trucking	18		29 Taxes	29
19 Gasoline, fuel, and oil	19		30 Utilities	30
20 Insurance (other than health)	20		31 Veterinary, breeding, and medicine	31
21 Interest (see instructions):			32 Other expenses (specify):	
a Mortgage (paid to banks, etc.)	21a	1,820,097	a	32a
b Other	21b	3,311,145	b	32b
22 Labor hired (less employment credits)	22		c	32c
			d	32d
			e	32e
			f	32f
33 Total expenses. Add lines 10 through 32f. If line 32f is negative, see instructions			33	161,695,671
34 Net farm profit or (loss). Subtract line 33 from line 9			34	

If a profit, stop here and see instructions for where to report. If a loss, complete line 36.

35 Reserved for future use.**36** Check the box that describes your investment in this activity and see instructions for where to report your loss:**a** ☐ All investment is at risk. **b** ☐ Some investment is not at risk.

For Paperwork Reduction Act Notice, see the separate instructions.

Cat. No. 11346H

Schedule F (Form 1040) 2023

TOTAL FORMS 4562 FILED: 1,713,125

TOTAL FORMS 4562 E-FILED: 1,657,490

Form **4562**Department of the Treasury
Internal Revenue Service**Depreciation and Amortization**
(Including Information on Listed Property)

Attach to your tax return.

Go to www.irs.gov/Form4562 for instructions and the latest information.

OMB No. 1545-0172

2023Attachment
Sequence No. **179**

Name(s) shown on return	Business or activity to which this form relates	Identifying number
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Part I Election To Expense Certain Property Under Section 179**Note:** If you have any listed property, complete Part V before you complete Part I.

1	Maximum amount (see instructions)	1	
2	Total cost of section 179 property placed in service (see instructions)	2	211,327
3	Threshold cost of section 179 property before reduction in limitation (see instructions)	3	
4	Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-	4	
5	Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions	5	
6	(a) Description of property	(b) Cost (business use only)	(c) Elected cost
7	Listed property. Enter the amount from line 29	7	13,246
8	Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7	8	200,379
9	Tentative deduction. Enter the smaller of line 5 or line 8	9	
10	Carryover of disallowed deduction from line 13 of your 2022 Form 4562	10	33,951
11	Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions	11	
12	Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11	12	195,099
13	Carryover of disallowed deduction to 2024. Add lines 9 and 10, less line 12	13	

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.**Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)**

14	Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions	14	472,485
15	Property subject to section 168(f)(1) election	15	355
16	Other depreciation (including ACRS)	16	181,659

Part III MACRS Depreciation (Don't include listed property. See instructions.)**Section A**

17	MACRS deductions for assets placed in service in tax years beginning before 2023	17	1,086,185
18	If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here <input type="checkbox"/> *82		

Section B—Assets Placed in Service During 2023 Tax Year Using the General Depreciation System

(a) Classification of property	(b) Month and year placed in service	(c) Basis for depreciation (business/investment use only—see instructions)	(d) Recovery period	(e) Convention	(f) Method	(g) Depreciation deduction
19a 3-year property		18,749				18,764
b 5-year property		349,874				349,974
c 7-year property		253,691				253,768
d 10-year property		26,483				26,492
e 15-year property		257,092				257,137
f 20-year property		8,778				8,788
g 25-year property		103	25 yrs.		S/L	103
h Residential rental property		215,790	27.5 yrs.	MM	S/L	215,817
i Nonresidential real property		149,434	39 yrs.	MM	S/L	149,454

Section C—Assets Placed in Service During 2023 Tax Year Using the Alternative Depreciation System

20a Class life		17,032			S/L	17,052
b 12-year		694	12 yrs.		S/L	698
c 30-year		33,191	30 yrs.	MM	S/L	33,194
d 40-year		12,991	40 yrs.	MM	S/L	13,019

Part IV Summary (See instructions.)

21	Listed property. Enter amount from line 28	21	237,292
22	Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations—see instructions	22	1,540,098
23	For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs	23	746

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 12906N

Form **4562** (2023)

Form **4562**Department of the Treasury
Internal Revenue Service**Depreciation and Amortization**
(Including Information on Listed Property)

Attach to your tax return.

Go to www.irs.gov/Form4562 for instructions and the latest information.

OMB No. 1545-0172

2023Attachment
Sequence No. **179**

Name(s) shown on return	Business or activity to which this form relates	Identifying number
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Part I Election To Expense Certain Property Under Section 179**Note:** If you have any listed property, complete Part V before you complete Part I.

1 Maximum amount (see instructions)	1	
2 Total cost of section 179 property placed in service (see instructions)	2	39,739,800
3 Threshold cost of section 179 property before reduction in limitation (see instructions)	3	
4 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-	4	
5 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions	5	
6 (a) Description of property	(b) Cost (business use only)	(c) Elected cost
7 Listed property. Enter the amount from line 29	7	1,071,103
8 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7	8	16,910,245
9 Tentative deduction. Enter the smaller of line 5 or line 8	9	
10 Carryover of disallowed deduction from line 13 of your 2022 Form 4562	10	2,409,930
11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions	11	
12 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11	12	16,156,916
13 Carryover of disallowed deduction to 2024. Add lines 9 and 10, less line 12	13	

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.**Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)**

14 Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions	14	276,998,923
15 Property subject to section 168(f)(1) election	15	421,975
16 Other depreciation (including ACRS)	16	24,555,664

Part III MACRS Depreciation (Don't include listed property. See instructions.)**Section A**

17 MACRS deductions for assets placed in service in tax years beginning before 2023	17	232,557,858
18 If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here <input type="checkbox"/>		

Section B—Assets Placed in Service During 2023 Tax Year Using the General Depreciation System

(a) Classification of property	(b) Month and year placed in service	(c) Basis for depreciation (business/investment use only—see instructions)	(d) Recovery period	(e) Convention	(f) Method	(g) Depreciation deduction
19a 3-year property		4,882,649				1,145,979
b 5-year property		89,945,294				13,063,933
c 7-year property		49,720,850				5,337,155
d 10-year property		8,336,761				690,911
e 15-year property		56,056,565				2,577,965
f 20-year property		7,950,658				307,190
g 25-year property		134,131	25 yrs.		S/L	2,355
h Residential rental property		134,704,184	27.5 yrs.	MM	S/L	2,449,791
i Nonresidential real property		172,250,356	39 yrs.	MM	S/L	2,079,801

Section C—Assets Placed in Service During 2023 Tax Year Using the Alternative Depreciation System

20a Class life		40,603,983			S/L	1,241,564
b 12-year		23,294,952	12 yrs.		S/L	621,638
c 30-year		171,398,117	30 yrs.	MM	S/L	2,855,030
d 40-year		130,012,992	40 yrs.	MM	S/L	1,635,878

Part IV Summary (See instructions.)

21 Listed property. Enter amount from line 28	21	6,167,142
22 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations—see instructions	22	575,100,737
23 For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs	23	1,208,302

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 12906N

Form **4562** (2023)

Form 4562 (2023)

Page **2****Part V Listed Property** (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)**Note:** For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete **only** 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.**Section A—Depreciation and Other Information** (Caution: See the instructions for limits for passenger automobiles.)**24a** Do you have evidence to support the business/investment use claimed? ☐ Yes ☐ No **24b** If "Yes," is the evidence written? ☐ Yes ☐ No

(a) Type of property (list vehicles first)	(b) Date placed in service	(c) Business/investment use percentage	(d) Cost or other basis	(e) Basis for depreciation (business/investment use only)	(f) Recovery period	(g) Method/Convention	(h) Depreciation deduction	(i) Elected section 179 cost
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25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions .	25	56,657	
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26 Property used more than 50% in a qualified business use:

		%						
		%						
		%						

27 Property used 50% or less in a qualified business use:

		%			S/L –			
		%			S/L –			
		%			S/L –			

28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1 . **28****29** Add amounts in column (i), line 26. Enter here and on line 7, page 1 **29****Section B—Information on Use of Vehicles**

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

	(a) Vehicle 1	(b) Vehicle 2	(c) Vehicle 3	(d) Vehicle 4	(e) Vehicle 5	(f) Vehicle 6
30 Total business/investment miles driven during the year (don't include commuting miles) .						
31 Total commuting miles driven during the year						
32 Total other personal (noncommuting) miles driven						
33 Total miles driven during the year. Add lines 30 through 32						
34 Was the vehicle available for personal use during off-duty hours?	Yes	No	Yes	No	Yes	No

Line 42 Amortization of Costs, by Section

35 Was the vehicle used primarily by a r than 5% owner or related person? . 59e-Optional Write-Off	*68				
36 Is another vehicle available for personal 167h-Geological & Geophysical Exp	117				

Section C—Question

Answer these questions to determine if you more than 5% owners or related persons.

37 Do you maintain a written policy sta your employees?	178-Cost of Acquiring a Lease	28,260	ommuting, by uting, by your owners ees about the s icles.	Yes	No
38 Do you maintain a written policy sta employees? See the instructions for	194-Qualified Forestation and Reforestation Costs	1,250			
39 Do you treat all use of vehicles by err	195-Business Start-Up Expenditures	19,380			
40 Do you provide more than five vehic use of the vehicles, and retain the inf	197-Various Intangibles	48,859			
41 Do you meet the requirements conce	171-Taxable Bond Premium	56			
Note: If your answer to 37, 38, 39, 4	248-Corporate Organizational Exp	255			
	709-Organizational Expenditures	14,076			
	Other	115,324			

Part VI Amortization

(a) Description of costs	(b) Date amortization begins	(c) Amortizable amount	(d) Code section	(e) Amortization period or percentage	(f) Amortization for this year
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42 Amortization of costs that begins during your 2023 tax year (see instructions): **216,797**

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43 Amortization of costs that began before your 2023 tax year **43** **495,454****44** **Total.** Add amounts in column (f). See the instructions for where to report **44** **600,271**Form **4562** (2023)

Form 4562 (2023)

Page **2****Part V Listed Property** (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)**Note:** For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete **only** 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.**Section A—Depreciation and Other Information** (Caution: See the instructions for limits for passenger automobiles.)**24a** Do you have evidence to support the business/investment use claimed? ☐ Yes ☐ No **24b** If "Yes," is the evidence written? ☐ Yes ☐ No

(a) Type of property (list vehicles first)	(b) Date placed in service	(c) Business/investment use percentage	(d) Cost or other basis	(e) Basis for depreciation (business/investment use only)	(f) Recovery period	(g) Method/Convention	(h) Depreciation deduction	(i) Elected section 179 cost
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25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions .	25	3,711,970	
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26 Property used more than 50% in a qualified business use:

		%						
		%						
		%						

27 Property used 50% or less in a qualified business use:

		%			S/L –			
		%			S/L –			
		%			S/L –			

28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1 . **28****29** Add amounts in column (i), line 26. Enter here and on line 7, page 1 **29****Section B—Information on Use of Vehicles**

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

	(a) Vehicle 1	(b) Vehicle 2	(c) Vehicle 3	(d) Vehicle 4	(e) Vehicle 5	(f) Vehicle 6
30 Total business/investment miles driven during the year (don't include commuting miles) .						
31 Total commuting miles driven during the year						
32 Total other personal (noncommuting) miles driven						
33 Total miles driven during the year. Add lines 30 through 32						
34 Was the vehicle available for personal use during off-duty hours?	Yes	No	Yes	No	Yes	No

Line 42 Amortization of Costs, by Section

35 Was the vehicle used primarily by a more than 5% owner or related person? . 59e-Optional Write-Off	*29,719				
36 Is another vehicle available for personal use? . 167h-Geological & Geophysical Exp	21,517				

Section C—Question

Answer these questions to determine if you are more than 5% owners or related persons.

37 Do you maintain a written policy stating that the vehicle is for business use only? 174-Research and Experimental Procedures	5,057,510	Employees who are not more than 5% owners or related persons. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.	Yes	No
38 Do you maintain a written policy stating that the vehicle is for business use only? See the instructions for 178-Cost of Acquiring a Lease	828,075			
39 Do you treat all use of vehicles by employees as business use? 194-Qualified Forestation and Reforestation Costs	4,966			
40 Do you provide more than five vehicles to employees? 195-Business Start-Up Expenditures	176,644			
41 Do you meet the requirements concerning the use of vehicles? 197-Various Intangibles	4,518,801			
42 Do you treat all use of vehicles by employees as business use? 171-Taxable Bond Premium	11,640			
43 Do you provide more than five vehicles to employees? 248-Corporate Organizational Exp	2,959			
44 Do you meet the requirements concerning the use of vehicles? 709-Organizational Expenditures	78,016			
Note: If your answer to 37, 38, 39, 41, or 42 is "Yes," enter the number of vehicles. Other	5,835,271			

Part VI Amortization

(a) Description of costs	(b) Date amortization begins	(c) Amortizable amount	(d) Code section	(e) Amortization period or percentage	(f) Amortization for this year
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42 Amortization of costs that begins during your 2023 tax year (see instructions): **16,565,378**

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43 Amortization of costs that began before your 2023 tax year **43** **120,839,671****44** **Total.** Add amounts in column (f). See the instructions for where to report **44** **137,405,050**Form **4562** (2023)

TOTAL FORMS 4797 FILED: 423,148 TOTAL FORMS 4797 E-FILED: 413,836

Form **4797**Department of the Treasury
Internal Revenue Service**Sales of Business Property**
(Also Involuntary Conversions and Recapture Amounts
Under Sections 179 and 280F(b)(2))Attach to your tax return.
Go to www.irs.gov/Form4797 for instructions and the latest information.

OMB No. 1545-0184

2023Attachment
Sequence No. **27**

Name(s) shown on return

Identifying number

1a	Enter the gross proceeds from sales or exchanges reported to you for 2023 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20. See instructions	1a	34,944
b	Enter the total amount of gain that you are including on lines 2, 10, and 24 due to the partial dispositions of MACRS assets	1b	108
c	Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS assets	1c	361

Part I Sales or Exchanges of Property Used in a Trade or Business and Involuntary Conversions From Other Than Casualty or Theft—Most Property Held More Than 1 Year (see instructions)

2	(a) Description of property	(b) Date acquired (mo., day, yr.)	(c) Date sold (mo., day, yr.)	(d) Gross sales price	(e) Depreciation allowed or allowable since acquisition	(f) Cost or other basis, plus improvements and expense of sale	(g) Gain or (loss) Subtract (f) from the sum of (d) and (e)
						gain	118,522
						loss	105,919
3	Gain, if any, from Form 4684, line 39						0
4	Section 1231 gain from installment sales from Form 6252, line 26 or 37						40,675
5	Section 1231 gain or (loss) from like-kind exchanges from Form 8824						2,271
6	Gain, if any, from line 32, from other than casualty or theft						97,459
7	Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows						332,002
Partnerships and S corporations. Report the gain or (loss) following the instructions for Form 1065, Schedule K, line 10, or Form 1120-S, Schedule K, line 9. Skip lines 8, 9, 11, and 12 below.							
Individuals, partners, S corporation shareholders, and all others. If line 7 is zero or a loss, enter the amount from line 7 on line 11 below and skip lines 8 and 9. If line 7 is a gain and you didn't have any prior year section 1231 losses, or they were recaptured in an earlier year, enter the gain from line 7 as a long-term capital gain on the Schedule D filed with your return and skip lines 8, 9, 11, and 12 below.							
8	Nonrecaptured net section 1231 losses from prior years. See instructions						0
9	Subtract line 8 from line 7. If zero or less, enter -0-. If line 9 is zero, enter the gain from line 7 on line 12 below. If line 9 is more than zero, enter the amount from line 8 on line 12 below and enter the gain from line 9 as a long-term capital gain on the Schedule D filed with your return. See instructions						0

Part II Ordinary Gains and Losses (see instructions)**10** Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less):

						gain	37,441
						loss	26,325
11	Loss, if any, from line 7						(d)
12	Gain, if any, from line 7 or amount from line 8, if applicable						0
13	Gain, if any, from line 31						104,317
14	Net gain or (loss) from Form 4684, lines 31 and 38a						183
15	Ordinary gain from installment sales from Form 6252, line 25 or 36						163
16	Ordinary gain or (loss) from like-kind exchanges from Form 8824						240
17	Combine lines 10 through 16						147,918
18	For all except individual returns, enter the amount from line 17 on the appropriate line of your return and skip lines a and b below. For individual returns, complete lines a and b below.						
a	If the loss on line 11 includes a loss from Form 4684, line 35, column (b)(ii), enter that part of the loss here. Enter the loss from income-producing property on Schedule A (Form 1040), line 16. (Do not include any loss on property used as an employee.) Identify as from "Form 4797, line 18a." See instructions					18a	
b	Redetermine the gain or (loss) on line 17 excluding the loss, if any, on line 18a. Enter here and on Schedule 1 (Form 1040), Part I, line 4					18b	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 130861

Form **4797** (2023)

Form **4797**
Department of the Treasury
Internal Revenue Service

Sales of Business Property
(Also Involuntary Conversions and Recapture Amounts
Under Sections 179 and 280F(b)(2))

Attach to your tax return.
Go to www.irs.gov/Form4797 for instructions and the latest information.

OMB No. 1545-0184

2023Attachment
Sequence No. **27**

Name(s) shown on return

Identifying number

1a Enter the gross proceeds from sales or exchanges reported to you for 2023 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20. See instructions	1a	51,695,077
b Enter the total amount of gain that you are including on lines 2, 10, and 24 due to the partial dispositions of MACRS assets	1b	56,346
c Enter the total amount of loss that you are including on lines 2 and 10 due to the partial dispositions of MACRS assets	1c	39,864

Part I Sales or Exchanges of Property Used in a Trade or Business and Involuntary Conversions From Other Than Casualty or Theft—Most Property Held More Than 1 Year (see instructions)

2	(a) Description of property	(b) Date acquired (mo., day, yr.)	(c) Date sold (mo., day, yr.)	(d) Gross sales price	(e) Depreciation allowed or allowable since acquisition	(f) Cost or other basis, plus improvements and expense of sale	(g) Gain or (loss) Subtract (f) from the sum of (d) and (e)
						gain	92,616,278
						loss	28,963,497
3	Gain, if any, from Form 4684, line 39						0
4	Section 1231 gain from installment sales from Form 6252, line 26 or 37						17,789,358
5	Section 1231 gain or (loss) from like-kind exchanges from Form 8824						1,998,280
6	Gain, if any, from line 32, from other than casualty or theft						83,886,960
7	Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows						204,142,624
Partnerships and S corporations. Report the gain or (loss) following the instructions for Form 1065, Schedule K, line 10, or Form 1120-S, Schedule K, line 9. Skip lines 8, 9, 11, and 12 below.							
Individuals, partners, S corporation shareholders, and all others. If line 7 is zero or a loss, enter the amount from line 7 on line 11 below and skip lines 8 and 9. If line 7 is a gain and you didn't have any prior year section 1231 losses, or they were recaptured in an earlier year, enter the gain from line 7 as a long-term capital gain on the Schedule D filed with your return and skip lines 8, 9, 11, and 12 below.							
8	Nonrecaptured net section 1231 losses from prior years. See instructions						0
9	Subtract line 8 from line 7. If zero or less, enter -0-. If line 9 is zero, enter the gain from line 7 on line 12 below. If line 9 is more than zero, enter the amount from line 8 on line 12 below and enter the gain from line 9 as a long-term capital gain on the Schedule D filed with your return. See instructions						0

Part II Ordinary Gains and Losses (see instructions)

10	Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less):						
						gain	283,809,835
						loss	33,621,124
11	Loss, if any, from line 7						(d)
12	Gain, if any, from line 7 or amount from line 8, if applicable						0
13	Gain, if any, from line 31						43,838,188
14	Net gain or (loss) from Form 4684, lines 31 and 38a						-100,781
15	Ordinary gain from installment sales from Form 6252, line 25 or 36						2,119,243
16	Ordinary gain or (loss) from like-kind exchanges from Form 8824						103,559
17	Combine lines 10 through 16						297,618,656
18	For all except individual returns, enter the amount from line 17 on the appropriate line of your return and skip lines a and b below. For individual returns, complete lines a and b below.						
a	If the loss on line 11 includes a loss from Form 4684, line 35, column (b)(ii), enter that part of the loss here. Enter the loss from income-producing property on Schedule A (Form 1040), line 16. (Do not include any loss on property used as an employee.) Identify as from "Form 4797, line 18a." See instructions						18a
b	Redetermine the gain or (loss) on line 17 excluding the loss, if any, on line 18a. Enter here and on Schedule 1 (Form 1040), Part I, line 4						18b

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 130861

Form **4797** (2023)

TOTAL FORMS 5884 FILED: 21,610

TOTAL FORMS 5884 E-FILED: 21,397

Form **5884**
(Rev. March 2021)
Department of the Treasury
Internal Revenue Service

Work Opportunity Credit

OMB No. 1545-0219

► Attach to your tax return.
► Go to www.irs.gov/Form5884 for instructions and the latest information.

Attachment
Sequence No. **884**

Name(s) shown on return

Identifying number

1	Enter on the applicable line below the total qualified first- or second-year wages paid or incurred during the tax year, and multiply by the percentage shown, for services of employees who are certified as members of a targeted group.		
a	Qualified first-year wages of employees who worked for you at least 120 hours but fewer than 400 hours . . . \$ <u>6,066</u> × 25% (0.25)	1a	
b	Qualified first-year wages of employees who worked for you at least 400 hours . . . \$ <u>7,499</u> × 40% (0.40)	1b	
c	Qualified second-year wages of employees certified as long-term family assistance recipients . . . \$ <u>887</u> × 50% (0.50)	1c	
2	Add lines 1a, 1b, and 1c. See instructions for the adjustment you must make to your deduction for salaries and wages . . .	2	8,368
3	Work opportunity credit from partnerships, S corporations, cooperatives, estates, and trusts (see instructions) . . .	3	13,419
4	Add lines 2 and 3. Cooperatives, estates, and trusts, go to line 5. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, stop here and report this amount on Form 3800, Part III, line 4b . . .	4	21,610
5	Amount allocated to patrons of the cooperative or beneficiaries of the estate or trust (see instructions) . . .	5	
6	Cooperatives, estates, and trusts, subtract line 5 from line 4. Report this amount on Form 3800, Part III, line 4b . . .	6	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 13570D

Form **5884** (Rev. 3-2021)

Form 5884 (Rev. March 2021) Department of the Treasury Internal Revenue Service	Work Opportunity Credit ▶ Attach to your tax return. ▶ Go to www.irs.gov/Form5884 for instructions and the latest information.	OMB No. 1545-0219 Attachment Sequence No. 884
Name(s) shown on return		Identifying number
1 Enter on the applicable line below the total qualified first- or second-year wages paid or incurred during the tax year, and multiply by the percentage shown, for services of employees who are certified as members of a targeted group.		
a Qualified first-year wages of employees who worked for you at least 120 hours but fewer than 400 hours . . . \$ <u>216,260</u> × 25% (0.25)		1a
b Qualified first-year wages of employees who worked for you at least 400 hours \$ <u>565,630</u> × 40% (0.40)		1b
c Qualified second-year wages of employees certified as long-term family assistance recipients \$ <u>14,151</u> × 50% (0.50)		1c
2 Add lines 1a, 1b, and 1c. See instructions for the adjustment you must make to your deduction for salaries and wages		2 287,405
3 Work opportunity credit from partnerships, S corporations, cooperatives, estates, and trusts (see instructions)		3 78,640
4 Add lines 2 and 3. Cooperatives, estates, and trusts, go to line 5. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, stop here and report this amount on Form 3800, Part III, line 4b		4 366,045
5 Amount allocated to patrons of the cooperative or beneficiaries of the estate or trust (see instructions)		5
6 Cooperatives, estates, and trusts, subtract line 5 from line 4. Report this amount on Form 3800, Part III, line 4b		6
For Paperwork Reduction Act Notice, see separate instructions. Cat. No. 13570D Form 5884 (Rev. 3-2021)		

TOTAL FORMS 6765 FILED: 37,693

TOTAL FORMS 6765 E-FILED: 37,448

Form

6765

(Rev. December 2023)

Department of the Treasury
Internal Revenue Service

Name(s) shown on return

Credit for Increasing Research Activities

Attach to your tax return.

Go to www.irs.gov/Form6765 for instructions and the latest information.

OMB No. 1545-0619

Attachment
Sequence No. **676**

Identifying number

Section A—Regular Credit. Skip this section and go to Section B if you are electing or previously elected (and are not revoking) the alternative simplified credit.

1	Certain amounts paid or incurred to energy consortia (see instructions)	1	*7
2	Basic research payments to qualified organizations (see instructions)	2	*184
3	Qualified organization base period amount	3	[d]
4	Subtract line 3 from line 2. If zero or less, enter -0-	4	[d]
5	Wages for qualified services (do not include wages used in figuring the work opportunity credit)	5	2,029
6	Cost of supplies	6	1,256
7	Rental or lease costs of computers (see instructions)	7	368
8	Enter the applicable percentage of contract research expenses. See instructions	8	1,569
9	Total qualified research expenses. Add lines 5 through 8	9	2,387
10	Enter fixed-base percentage, but not more than 16% (0.16) (see instructions)	10	1,74%
11	Enter average annual gross receipts. See instructions	11	1,781
12	Multiply line 11 by the percentage on line 10	12	1,418
13	Subtract line 12 from line 9. If zero or less, enter -0-	13	2,347
14	Multiply line 9 by 50% (0.50)	14	2,387
15	Enter the smaller of line 13 or line 14	15	2,347
16	Add lines 1, 4, and 15	16	2,355
17	Are you electing the reduced credit under section 280C? Yes <input type="checkbox"/> No <input type="checkbox"/> If "Yes," multiply line 16 by 15.8% (0.158). If "No," multiply line 16 by 20% (0.20) and see the instructions for the statement that must be attached. Members of controlled groups or businesses under common control, see instructions for the statement that must be attached	17	2,358

Section B—Alternative Simplified Credit. Skip this section if you are completing Section A.

18	Certain amounts paid or incurred to energy consortia (see the line 1 instructions)	18	*14
19	Basic research payments to qualified organizations (see the line 2 instructions)	19	*14
20	Qualified organization base period amount (see the line 3 instructions)	20	*10
21	Subtract line 20 from line 19. If zero or less, enter -0-	21	*13
22	Add lines 18 and 21	22	28
23	Multiply line 22 by 20% (0.20)	23	19
24	Wages for qualified services (do not include wages used in figuring the work opportunity credit)	24	5,351
25	Cost of supplies	25	2,437
26	Rental or lease costs of computers (see the line 7 instructions)	26	773
27	Enter the applicable percentage of contract research expenses. See the line 8 instructions	27	3,443
28	Total qualified research expenses. Add lines 24 through 27	28	5,533
29	Enter your total qualified research expenses for the prior 3 tax years. If you had no qualified research expenses in any one of those years, skip lines 30 and 31	29	5,303
30	Divide line 29 by 6.0	30	4,460
31	Subtract line 30 from line 28. If zero or less, enter -0-	31	4,368
32	Multiply line 31 by 14% (0.14). If you skipped lines 30 and 31, multiply line 28 by 6% (0.06)	32	5,442
33	Add lines 23 and 32	33	5,445
34	Are you electing the reduced credit under section 280C? Yes <input type="checkbox"/> No <input type="checkbox"/> If "Yes," multiply line 33 by 79% (0.79). If "No," enter the amount from line 33 and see the line 17 instructions for the statement that must be attached. Members of controlled groups or businesses under common control, see instructions for the statement that must be attached	34	5,470

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 13700H

Form **6765** (Rev. 12-2023)

Form **6765**
(Rev. December 2023)
Department of the Treasury
Internal Revenue Service

Credit for Increasing Research Activities

Attach to your tax return.
Go to www.irs.gov/Form6765 for instructions and the latest information.

OMB No. 1545-0619

Attachment
Sequence No. **676**

Name(s) shown on return

Identifying number

Section A—Regular Credit. Skip this section and go to Section B if you are electing or previously elected (and are not revoking) the alternative simplified credit.

1	Certain amounts paid or incurred to energy consortia (see instructions)	1	*34
2	Basic research payments to qualified organizations (see instructions)	2	*10,497
3	Qualified organization base period amount	3	[d]
4	Subtract line 3 from line 2. If zero or less, enter -0-	4	[d]
5	Wages for qualified services (do not include wages used in figuring the work opportunity credit)	5	7,631,582
6	Cost of supplies	6	1,462,895
7	Rental or lease costs of computers (see instructions)	7	283,173
8	Enter the applicable percentage of contract research expenses. See instructions	8	3,025,454
9	Total qualified research expenses. Add lines 5 through 8	9	12,403,105
10	Enter fixed-base percentage, but not more than 16% (0.16) (see instructions)	10	%
11	Enter average annual gross receipts. See instructions	11	613,264,340
12	Multiply line 11 by the percentage on line 10	12	2,829,639
13	Subtract line 12 from line 9. If zero or less, enter -0-	13	10,021,225
14	Multiply line 9 by 50% (0.50)	14	6,201,553
15	Enter the smaller of line 13 or line 14	15	5,987,625
16	Add lines 1, 4, and 15	16	5,998,133
17	Are you electing the reduced credit under section 280C? Yes <input type="checkbox"/> No <input type="checkbox"/> If "Yes," multiply line 16 by 15.8% (0.158). If "No," multiply line 16 by 20% (0.20) and see the instructions for the statement that must be attached. Members of controlled groups or businesses under common control, see instructions for the statement that must be attached	17	542,947

Section B—Alternative Simplified Credit. Skip this section if you are completing Section A.

18	Certain amounts paid or incurred to energy consortia (see the line 1 instructions)	18	*2,245
19	Basic research payments to qualified organizations (see the line 2 instructions)	19	*13,466
20	Qualified organization base period amount (see the line 3 instructions)	20	*15,958
21	Subtract line 20 from line 19. If zero or less, enter -0-	21	*3,924
22	Add lines 18 and 21	22	6,169
23	Multiply line 22 by 20% (0.20)	23	1,234
24	Wages for qualified services (do not include wages used in figuring the work opportunity credit)	24	61,894,488
25	Cost of supplies	25	11,316,311
26	Rental or lease costs of computers (see the line 7 instructions)	26	1,659,903
27	Enter the applicable percentage of contract research expenses. See the line 8 instructions	27	6,554,978
28	Total qualified research expenses. Add lines 24 through 27	28	81,425,680
29	Enter your total qualified research expenses for the prior 3 tax years. If you had no qualified research expenses in any one of those years, skip lines 30 and 31	29	219,320,825
30	Divide line 29 by 6.0	30	36,313,329
31	Subtract line 30 from line 28. If zero or less, enter -0-	31	44,650,611
32	Multiply line 31 by 14% (0.14). If you skipped lines 30 and 31, multiply line 28 by 6% (0.06)	32	6,275,892
33	Add lines 23 and 32	33	6,277,126
34	Are you electing the reduced credit under section 280C? Yes <input type="checkbox"/> No <input type="checkbox"/> If "Yes," multiply line 33 by 79% (0.79). If "No," enter the amount from line 33 and see the line 17 instructions for the statement that must be attached. Members of controlled groups or businesses under common control, see instructions for the statement that must be attached	34	2,198,755

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 13700H

Form **6765** (Rev. 12-2023)

Section C—Current Year Credit

35	Enter the portion of the credit from Form 8932, line 2, that is attributable to wages that were also used to figure the credit on line 17 or line 34 (whichever applies)	35	*9
36	Subtract line 35 from line 17 or line 34 (whichever applies). If zero or less, enter -0-	36	7,826
37	Credit for increasing research activities from partnerships, S corporations, estates, and trusts	37	29,397
38	Add lines 36 and 37	38	37,101
	<ul style="list-style-type: none"> • Estates and trusts, go to line 39. • Partnerships and S corporations not electing the payroll tax credit, stop here and report this amount on Schedule K. • Partnerships and S corporations electing the payroll tax credit, complete Section D and report on Schedule K the amount on this line reduced by the amount on line 44. • Eligible small businesses, stop here and report the credit on Form 3800, Part III, line 4i. See instructions for the definition of eligible small business. • Filers other than eligible small businesses, stop here and report the credit on Form 3800, Part III, line 1c. <p>Note: Qualified small business filers, other than partnerships and S corporations, electing the payroll tax credit must complete Form 3800 before completing Section D.</p>		
39	Amount allocated to beneficiaries of the estate or trust (see instructions)	39	
40	Estates and trusts, subtract line 39 from line 38. For eligible small businesses, report the credit on Form 3800, Part III, line 4i. See instructions. For filers other than eligible small businesses, report the credit on Form 3800, Part III, line 1c	40	

Section D—Qualified Small Business Payroll Tax Election and Payroll Tax Credit. Skip this section if the payroll tax election does not apply. See instructions.

41	Check this box if you are a qualified small business electing the payroll tax credit. : *165 <input type="checkbox"/>		
42	Enter the portion of line 36 elected as a payroll tax credit (do not enter more than \$500,000). See instructions	42	*165
43	General business credit carryforward from the current year (see instructions). Partnerships and S corporations, skip this line and go to line 44	43	0
44	Partnerships and S corporations, enter the smaller of line 36 or line 42. All others, enter the smallest of line 36, line 42, or line 43. Enter here and on the applicable line of Form 8974, Part 1, column (e). Members of controlled groups or businesses under common control, see instructions for the statement that must be attached	44	*165

Section C—Current Year Credit

35	Enter the portion of the credit from Form 8932, line 2, that is attributable to wages that were also used to figure the credit on line 17 or line 34 (whichever applies)	35	*6,791
36	Subtract line 35 from line 17 or line 34 (whichever applies). If zero or less, enter -0-	36	2,734,192
37	Credit for increasing research activities from partnerships, S corporations, estates, and trusts	37	883,548
38	Add lines 36 and 37	38	3,617,740
	<ul style="list-style-type: none"> • Estates and trusts, go to line 39. • Partnerships and S corporations not electing the payroll tax credit, stop here and report this amount on Schedule K. • Partnerships and S corporations electing the payroll tax credit, complete Section D and report on Schedule K the amount on this line reduced by the amount on line 44. • Eligible small businesses, stop here and report the credit on Form 3800, Part III, line 4i. See instructions for the definition of eligible small business. • Filers other than eligible small businesses, stop here and report the credit on Form 3800, Part III, line 1c. 		
39	Amount allocated to beneficiaries of the estate or trust (see instructions)	39	
40	Estates and trusts, subtract line 39 from line 38. For eligible small businesses, report the credit on Form 3800, Part III, line 4i. See instructions. For filers other than eligible small businesses, report the credit on Form 3800, Part III, line 1c	40	

Section D—Qualified Small Business Payroll Tax Election and Payroll Tax Credit. Skip this section if the payroll tax election does not apply. See instructions.

41	Check this box if you are a qualified small business electing the payroll tax credit. See instructions <input type="checkbox"/>		
42	Enter the portion of line 36 elected as a payroll tax credit (do not enter more than \$500,000). See instructions	42	*27,665
43	General business credit carryforward from the current year (see instructions). Partnerships and S corporations, skip this line and go to line 44	43	0
44	Partnerships and S corporations, enter the smaller of line 36 or line 42. All others, enter the smallest of line 36, line 42, or line 43. Enter here and on the applicable line of Form 8974, Part 1, column (e). Members of controlled groups or businesses under common control, see instructions for the statement that must be attached	44	*27,665

TOTAL FORMS 8824 FILED: 13,830 [10,422]

TOTAL FORMS 8824 E-FILED: 13,123 [9,730]

Form **8824**
Department of the Treasury
Internal Revenue Service

Like-Kind Exchanges
(and section 1043 conflict-of-interest sales)

Attach to your tax return.

Go to www.irs.gov/Form8824 for instructions and the latest information.

OMB No. 1545-1190

2023Attachment
Sequence No. **109**

Name(s) shown on tax return

Identifying number

Part I Information on the Like-Kind Exchange

Note: Only real property should be described on lines 1 and 2. If the property described on line 1 or line 2 is real property located outside the United States, indicate the country.

- 1 Description of like-kind property given up: **Partnerships can file more than one copy of Form 8824, when needed. For example, in 2023, 13,830 Forms 8824 were attached to 10,422 Forms 1065. The number in brackets [] is the frequency of Form 1065.**
- 2 Description of like-kind property received:

- | | | | |
|---|---|---|------------|
| 3 | Date like-kind property given up was originally acquired (month, day, year) | 3 | MM/DD/YYYY |
| 4 | Date you actually transferred your property to the other party (month, day, year) | 4 | MM/DD/YYYY |
| 5 | Date like-kind property you received was identified by written notice to another party (month, day, year). See instructions for 45-day written identification requirement | 5 | MM/DD/YYYY |
| 6 | Date you actually received the like-kind property from other party (month, day, year). See instructions | 6 | MM/DD/YYYY |

- 7 Was the exchange of the property given up or received made with a related party, either directly or indirectly (such as through an intermediary)? See instructions. If "Yes," complete Part II. If "No," go to Part III ☐ Yes ☐ No **29 13,802**

Note: Do not file this form if a related party sold property into the exchange, directly or indirectly (such as through an intermediary); that property became your replacement property; and none of the exceptions on line 11 applies to the exchange. Instead, report the disposition of the property as if the exchange had been a sale. If one of the exceptions on line 11 applies to the exchange, complete Part II.

Part II Related Party Exchange Information

- | 8 | Name of related party | Relationship to you | Related party's identifying number |
|--|-----------------------|---------------------|------------------------------------|
| Address (no., street, and apt., room, or suite no.; city or town; state; and ZIP code) | | | |

- 9 During this tax year (and before the date that is 2 years after the last transfer of property that was part of the exchange), did the related party sell or dispose of any part of the like-kind property received from you (or an intermediary) in the exchange? ☐ Yes ☐ No

- 10 During this tax year (and before the date that is 2 years after the last transfer of property that was part of the exchange), did you sell or dispose of any part of the like-kind property you received? ☐ Yes ☐ No

If both lines 9 and 10 are "No" and this is the year of the exchange, go to Part III. If both lines 9 and 10 are "No" and this is **not** the year of the exchange, stop here. If either line 9 or line 10 is "Yes," complete Part III and report on this year's tax return the deferred gain or (loss) from line 24 **unless** one of the exceptions on line 11 applies.

- 11 If one of the exceptions below applies to the disposition, check the applicable box.
- a ☐ The disposition was after the death of either of the related parties.
- b ☐ The disposition was an involuntary conversion, and the threat of conversion occurred after the exchange.
- c ☐ You can establish to the satisfaction of the IRS that neither the exchange nor the disposition had tax avoidance as one of its principal purposes. If this box is checked, attach an explanation. See instructions.

For Paperwork Reduction Act Notice, see the instructions.

Cat. No. 12311A

Form **8824** (2023)

Form **8824**Department of the Treasury
Internal Revenue Service**Like-Kind Exchanges**
(and section 1043 conflict-of-interest sales)

Attach to your tax return.

Go to www.irs.gov/Form8824 for instructions and the latest information.

OMB No. 1545-1190

2023Attachment
Sequence No. **109**

Name(s) shown on tax return

Identifying number

Part I Information on the Like-Kind Exchange**Note:** Only real property should be described on lines 1 and 2. If the property described on line 1 or line 2 is real property located outside the United States, indicate the country.**1** Description of like-kind property given up:-----
-----**2** Description of like-kind property received: ****No money amounts are present on the page****-----
-----**3** Date like-kind property given up was originally acquired (month, day, year) **3** MM/DD/YYYY**4** Date you actually transferred your property to the other party (month, day, year) **4** MM/DD/YYYY**5** Date like-kind property you received was identified by written notice to another party (month, day, year). See instructions for 45-day written identification requirement **5** MM/DD/YYYY**6** Date you actually received the like-kind property from other party (month, day, year). See instructions **6** MM/DD/YYYY**7** Was the exchange of the property given up or received made with a related party, either directly or indirectly (such as through an intermediary)? See instructions. If "Yes," complete Part II. If "No," go to Part III . . . ☐ Yes ☐ No**Note:** Do not file this form if a related party sold property into the exchange, directly or indirectly (such as through an intermediary); that property became your replacement property; and none of the exceptions on line 11 applies to the exchange. Instead, report the disposition of the property as if the exchange had been a sale. If one of the exceptions on line 11 applies to the exchange, complete Part II.**Part II Related Party Exchange Information****8** Name of related party Relationship to you Related party's identifying number

Address (no., street, and apt., room, or suite no.; city or town; state; and ZIP code)

9 During this tax year (and before the date that is 2 years after the last transfer of property that was part of the exchange), did the related party sell or dispose of any part of the like-kind property received from you (or an intermediary) in the exchange? ☐ Yes ☐ No**10** During this tax year (and before the date that is 2 years after the last transfer of property that was part of the exchange), did you sell or dispose of any part of the like-kind property you received? ☐ Yes ☐ No*If both lines 9 and 10 are "No" and this is the year of the exchange, go to Part III. If both lines 9 and 10 are "No" and this is **not** the year of the exchange, stop here. If either line 9 or line 10 is "Yes," complete Part III and report on this year's tax return the deferred gain or (loss) from line 24 **unless** one of the exceptions on line 11 applies.***11** If one of the exceptions below applies to the disposition, check the applicable box.

- a** ☐ The disposition was after the death of either of the related parties.
- b** ☐ The disposition was an involuntary conversion, and the threat of conversion occurred after the exchange.
- c** ☐ You can establish to the satisfaction of the IRS that neither the exchange nor the disposition had tax avoidance as one of its principal purposes. If this box is checked, attach an explanation. See instructions.

Form 8824 (2023)

Page **2**

Name(s) shown on tax return. Do not enter name and social security number if shown on other side.

Your social security number

Part III Realized Gain or (Loss), Recognized Gain, and Basis of Like-Kind Property Received

Before you begin:

Multi-asset exchanges Y: 2,490

N: 11,341

- If you are e-filing Form 8824 and completing line 12, 15, or 25, see the instructions for important information regarding a separate statement you must attach.
- If you transferred and received (a) more than one group of like-kind properties, or (b) cash or other (not like-kind) property, see **Reporting of multi-asset exchanges** in the instructions.

Note: Complete lines 12 through 14 **only** if you gave up property that was not like-kind. Otherwise, go to line 15.

12	Fair market value (FMV) of other property given up. See instructions	12	225 [217]	
a	Description of other property given up			
13	Adjusted basis of other property given up	13	73 [66]	
14	Gain or (loss) recognized on other property given up. Subtract line 13 from line 12. Report the gain or (loss) in the same manner as if the exchange had been a sale	14	*186 [186]	
	Caution: If the property given up was used previously or partly as a home, see Property used as home in the instructions.			
15	Cash received, FMV of other property received, plus net liabilities assumed by other party, reduced (but not below zero) by any exchange expenses you incurred. See instructions	15	3,257 [2,759]	
a	Description of other property received			
16	FMV of like-kind property you received	16	13,502 [10,359]	
17	Add lines 15 and 16	17	13,794 [10,386]	
18	Adjusted basis of like-kind property you gave up, net amounts paid to other party, plus any exchange expenses not used on line 15. See instructions	18	13,291 [10,174]	
19	Realized gain or (loss). Subtract line 18 from line 17	19	13,796 [10,414]	
20	Enter the smaller of line 15 or line 19, but not less than zero	20	3,231 [2,733]	
21	Ordinary income under recapture rules. Enter here and on Form 4797, line 16. See instructions	21	378 [241]	
22	Subtract line 21 from line 20. If zero or less, enter -0-. If more than zero, enter here and on Schedule D or Form 4797, unless the installment method applies. See instructions	22	3,000 [2,645]	
23	Recognized gain. Add lines 21 and 22	23	3,230 [2,735]	
24	Deferred gain or (loss). Subtract line 23 from line 19. If a related party exchange, see instructions	24	13,239 [10,128]	
25	Basis of like-kind property received. Subtract line 15 from the sum of lines 18 and 23. See instructions Note: Complete lines 25a, 25b, and 25c if you received like-kind section 1250 property, like-kind section 1245 property, or like-kind intangible property in the exchange.	25	13,301 [10,184]	
a	Basis of like-kind section 1250 property received	25a		
b	Basis of like-kind section 1245 property received	25b		
c	Basis of like-kind intangible property received	25c		

Part IV Deferral of Gain From Section 1043 Conflict-of-Interest Sales

Note: This part is to be used **only** by officers or employees of the executive branch of the federal government or judicial officers of the federal government (including certain spouses, minor or dependent children, and trustees as described in section 1043) for reporting nonrecognition of gain under section 1043 on the sale of property to comply with the conflict-of-interest requirements. This part can be used **only** if the cost of the replacement property is more than the basis of the divested property.

26	Enter the number from the upper right corner of your certificate of divestiture. (Do not attach a copy of your certificate. Keep the certificate with your records.)		-
27	Description of divested property		
28	Description of replacement property		
29	Date divested property was sold (month, day, year)	29	MM/DD/YYYY
30	Sales price of divested property. See instructions	30	
31	Basis of divested property	31	
32	Realized gain. Subtract line 31 from line 30	32	
33	Cost of replacement property purchased within 60 days after date of sale	33	
34	Subtract line 33 from line 30. If zero or less, enter -0-	34	
35	Ordinary income under recapture rules. Enter here and on Form 4797, line 10. See instructions	35	
36	Subtract line 35 from line 34. If zero or less, enter -0-. If more than zero, enter here and on Schedule D or Form 4797. See instructions	36	
37	Deferred gain. Subtract the sum of lines 35 and 36 from line 32	37	
38	Basis of replacement property. Subtract line 37 from line 33	38	

Form **8824** (2023)

Form 8824 (2023)

Page **2**

Name(s) shown on tax return. Do not enter name and social security number if shown on other side.

Your social security number

Part III Realized Gain or (Loss), Recognized Gain, and Basis of Like-Kind Property Received**Before you begin:**

- If you are **e-filing** Form 8824 and completing line 12, 15, or 25, see the instructions for important information regarding a separate statement you must attach.
- If you transferred **and** received (a) more than one group of like-kind properties, or (b) cash or other (not like-kind) property, see **Reporting of multi-asset exchanges** in the instructions.

Note: Complete lines 12 through 14 **only** if you gave up property that was not like-kind. Otherwise, go to line 15.

12	Fair market value (FMV) of other property given up. See instructions	12	62,790	
a	Description of other property given up			
13	Adjusted basis of other property given up	13	49,719	
14	Gain or (loss) recognized on other property given up. Subtract line 13 from line 12. Report the gain or (loss) in the same manner as if the exchange had been a sale	14		*13,070
	Caution: If the property given up was used previously or partly as a home, see Property used as home in the instructions.			
15	Cash received, FMV of other property received, plus net liabilities assumed by other party, reduced (but not below zero) by any exchange expenses you incurred. See instructions	15		2,925,992
a	Description of other property received			
16	FMV of like-kind property you received	16		55,202,097
17	Add lines 15 and 16	17		58,128,089
18	Adjusted basis of like-kind property you gave up, net amounts paid to other party, plus any exchange expenses not used on line 15. See instructions	18		28,144,047
19	Realized gain or (loss). Subtract line 18 from line 17	19		30,067,919
20	Enter the smaller of line 15 or line 19, but not less than zero	20		2,816,691
21	Ordinary income under recapture rules. Enter here and on Form 4797, line 16. See instructions	21		145,132
22	Subtract line 21 from line 20. If zero or less, enter -0-. If more than zero, enter here and on Schedule D or Form 4797, unless the installment method applies. See instructions	22		2,587,824
23	Recognized gain. Add lines 21 and 22	23		2,732,956
24	Deferred gain or (loss). Subtract line 23 from line 19. If a related party exchange, see instructions	24		27,381,355
25	Basis of like-kind property received. Subtract line 15 from the sum of lines 18 and 23. See instructions Note: Complete lines 25a, 25b, and 25c if you received like-kind section 1250 property, like-kind section 1245 property, or like-kind intangible property in the exchange.	25		28,354,666
a	Basis of like-kind section 1250 property received	25a		
b	Basis of like-kind section 1245 property received	25b		
c	Basis of like-kind intangible property received	25c		

Part IV Deferral of Gain From Section 1043 Conflict-of-Interest Sales

Note: This part is to be used **only** by officers or employees of the executive branch of the federal government or judicial officers of the federal government (including certain spouses, minor or dependent children, and trustees as described in section 1043) for reporting nonrecognition of gain under section 1043 on the sale of property to comply with the conflict-of-interest requirements. This part can be used **only** if the cost of the replacement property is more than the basis of the divested property.

26	Enter the number from the upper right corner of your certificate of divestiture. (Do not attach a copy of your certificate. Keep the certificate with your records.)			
27	Description of divested property			
28	Description of replacement property			
29	Date divested property was sold (month, day, year)	29		MM/DD/YYYY
30	Sales price of divested property. See instructions	30		
31	Basis of divested property	31		
32	Realized gain. Subtract line 31 from line 30	32		
33	Cost of replacement property purchased within 60 days after date of sale	33		
34	Subtract line 33 from line 30. If zero or less, enter -0-	34		
35	Ordinary income under recapture rules. Enter here and on Form 4797, line 10. See instructions	35		
36	Subtract line 35 from line 34. If zero or less, enter -0-. If more than zero, enter here and on Schedule D or Form 4797. See instructions	36		
37	Deferred gain. Subtract the sum of lines 35 and 36 from line 32	37		
38	Basis of replacement property. Subtract line 37 from line 33	38		

Form **8824** (2023)

Form **8825** (Rev. 11-2018)

Form **8825**
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

Rental Real Estate Income and Expenses of a Partnership or an S Corporation

► Attach to Form 1065 or Form 1120S.

► Go to www.irs.gov/Form8825 for the latest information.

OMB No. 1545-0123

Name		Employer identification number	
1	Show the type and address of each property. For each rental real estate property listed, report the number of days rented at fair rental value and days with personal use. See instructions. See page 2 to list additional properties.		
	Physical address of each property—street, city, state, ZIP code	Type—Enter code 1–8; see page 2 for list	Fair Rental Days
A	Total Number of Properties Reported 3,230		
B			
C			
D			

Rental Real Estate Income		Properties			
		A	B	C	D
2	Gross rents	925,728,123			
Lines 2 through 17 are totals for all properties.					
Rental Real Estate Expenses					
3	Advertising				4,467,456
4	Auto and travel				1,690,090
5	Cleaning and maintenance				30,249,034
6	Commissions				2,952,983
7	Insurance				30,107,995
8	Legal and other professional fees				56,842,463
9	Interest (see instructions)				223,893,727
10	Repairs				54,921,356
11	Taxes				108,088,916
12	Utilities				46,300,245
13	Wages and salaries				35,489,698
14	Depreciation (see instructions)				249,705,611
15	Other (list) ►				108,622,464
16	Total expenses for each property. Add lines 3 through 15				953,332,039
17	Income or (loss) from each property. Subtract line 16 from line 2				-27,603,916
18a	Total gross rents. Add gross rents from line 2, columns A through H				925,728,123
18b	Total expenses. Add total expenses from line 16, columns A through H				(953,332,039)
19	Net gain (loss) from Form 4797, Part II, line 17, from the disposition of property from rental real estate activities				8,350,818
20a	Net income (loss) from rental real estate activities from partnerships, estates, and trusts in which this partnership or S corporation is a partner or beneficiary (from Schedule K-1)				-81,369,276
b Identify below the partnerships, estates, or trusts from which net income (loss) is shown on line 20a. Attach a schedule if more space is needed.					
(1) Name		(2) Employer identification number			
.			
.			
.			
21	Net rental real estate income (loss). Combine lines 18a through 20a. Enter the result here and on: • Form 1065 or 1120S: Schedule K, line 2				-100,622,375

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 10136Z

Form **8825** (Rev. 11-2018)

Form 8844 (Rev. March 2020) Department of the Treasury Internal Revenue Service	TOTAL FORMS 8844 FILED: 3,943 TOTAL FORMS 8844 E-FILED: 3,928 Empowerment Zone Employment Credit ► Attach to your tax return. ► Go to www.irs.gov/Form8844 for instructions and the latest information.	OMB No. 1545-1444 Attachment Sequence No. 99
Name(s) shown on return		Identifying number

1	Enter the total qualified empowerment zone wages paid or incurred during the current year (see instructions)	1	1,211
2	Multiply line 1 by 20% (0.20). See instructions for the adjustment you must make to the deduction for salaries and wages	2	
3	Empowerment zone employment credit from partnerships, S corporations, cooperatives, estates, and trusts	3	2,733
4	Add lines 2 and 3. Cooperatives, estates, and trusts, go to line 5. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, stop here and report this amount on Form 3800, Part III, line 3	4	3,943
5	Amount allocated to patrons of the cooperative or beneficiaries of the estate or trust (see instructions)	5	
6	Cooperatives, estates, and trusts, subtract line 5 from line 4. Report this amount on Form 3800, Part III, line 3	6	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 16145S

Form **8844** (Rev. 3-2020)

Form **8844**
(Rev. March 2020)
Department of the Treasury
Internal Revenue Service

Empowerment Zone Employment Credit

► Attach to your tax return.

► Go to www.irs.gov/Form8844 for instructions and the latest information.

OMB No. 1545-1444

Attachment
Sequence No. **99**

Name(s) shown on return

Identifying number

1	Enter the total qualified empowerment zone wages paid or incurred during the current year (see instructions)	1	148,025
2	Multiply line 1 by 20% (0.20). See instructions for the adjustment you must make to the deduction for salaries and wages	2	
3	Empowerment zone employment credit from partnerships, S corporations, cooperatives, estates, and trusts	3	11,413
4	Add lines 2 and 3. Cooperatives, estates, and trusts, go to line 5. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, stop here and report this amount on Form 3800, Part III, line 3	4	41,018
5	Amount allocated to patrons of the cooperative or beneficiaries of the estate or trust (see instructions)	5	
6	Cooperatives, estates, and trusts, subtract line 5 from line 4. Report this amount on Form 3800, Part III, line 3	6	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 16145S

Form **8844** (Rev. 3-2020)

Form 8846 Department of the Treasury Internal Revenue Service	Credit for Employer Social Security and Medicare Taxes Paid on Certain Employee Tips Attach to your tax return. Go to www.irs.gov/Form8846 for the latest information.	OMB No. 1545-0123 <div style="font-size: 2em; font-weight: bold; text-align: center;">2023</div> Attachment Sequence No. 846
Name(s) shown on return		Identifying number
TOTAL FORMS 8846 FILED: 63,713 TOTAL FORMS 8846 E-FILED: 63,051		

Note: Claim this credit **only** for employer social security and Medicare taxes paid by a food or beverage employer where tipping is customary for providing food or beverages. See the instructions for line 1.

1 Tips received by employees for services on which you paid or incurred employer social security and Medicare taxes during the tax year (see instructions)	1	37,003
2 Tips not subject to the credit provisions (see instructions)	2	7,239
3 Creditable tips. Subtract line 2 from line 1	3	
4 Multiply line 3 by 7.65% (0.0765). If you had any tipped employees whose wages (including tips) exceeded \$160,200, see instructions and check here <input type="checkbox"/>	4	
5 Credit for employer social security and Medicare taxes paid on certain employee tips from partnerships and S corporations	5	
6 Add lines 4 and 5. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 4f	6	63,713

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 16148Z

Form **8846** (2023)

Form 8846 Department of the Treasury Internal Revenue Service	Credit for Employer Social Security and Medicare Taxes Paid on Certain Employee Tips Attach to your tax return. Go to www.irs.gov/Form8846 for the latest information.	OMB No. 1545-0123
		2023 Attachment Sequence No. 846
Name(s) shown on return		Identifying number
Note: Claim this credit only for employer social security and Medicare taxes paid by a food or beverage employer where tipping is customary for providing food or beverages. See the instructions for line 1.		
1 Tips received by employees for services on which you paid or incurred employer social security and Medicare taxes during the tax year (see instructions)		1 16,140,820
2 Tips not subject to the credit provisions (see instructions)		2 643,574
3 Creditable tips. Subtract line 2 from line 1		3
4 Multiply line 3 by 7.65% (0.0765). If you had any tipped employees whose wages (including tips) exceeded \$160,200, see instructions and check here <input type="checkbox"/>		4
5 Credit for employer social security and Medicare taxes paid on certain employee tips from partnerships and S corporations		5
6 Add lines 4 and 5. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 4f		6 1,800,137
For Paperwork Reduction Act Notice, see instructions.		Cat. No. 16148Z
		Form 8846 (2023)

TOTAL FORMS 8881 FILED: 5,233

TOTAL FORMS 8881 E-FILED: 5,018

Form **8881**
(Rev. December 2023)
Department of the Treasury
Internal Revenue Service
Name(s) shown on return

**Credit for Small Employer Pension Plan Startup
Costs, Auto-Enrollment, and Military Spouse Participation**

Attach to your tax return.
Go to www.irs.gov/Form8881 for instructions and the latest information.

OMB No. 1545-1810

Attachment
Sequence No. **130**

Identifying number

Part I Credit for Small Employer Pension Plan Startup Costs (Including Employer Contributions)

A	Enter the number of qualifying employees. See instructions		
1	Qualified startup costs incurred during the tax year	1	1,784
2	Employers with 1-50 employees enter the amount from line 1. Employers with 51-100 employees enter 50% (0.50) of line 1	2	1,784
3	Enter the number of employees eligible to participate in the pension plan. See instructions. 2,134 X \$250	3	
4	Enter the greater of \$500 or the amount from line 3 (Do not enter more than \$5,000)	4	4,950
5	Enter the smaller of line 2 or line 4	5	1,784
6a	Enter the number of employees from the preceding tax year. See instructions	6a	
b	Enter employer contributions made to the plan, but don't include (i) elective deferrals, (ii) contributions made to employees whose wages paid to the employee were in excess of \$100,000 and (iii) any amount of contributions to an employee to whom you made contributions of more than \$1,000	6b	
c	For employees for whom you made matching and nonelective contributions of more than \$1,000, (and who are not disqualified because they meet 6b(ii) above), see the instructions for information on how to determine the amount to enter on line 6c. If you did not make this type of contributions, enter -0-	6c	
d	Add lines 6b and 6c If the number of employees entered on line 6a is 50 or less, enter the amount from line 6d on line 6f. If the number of employees entered on line 6a is 51-100, continue to line 6e(1).	6d	
e (1)	Subtract 50 (50.0) from the number of employees entered on line 6a	6e(1)	
(2)	Multiply line 6e(1) by 2% (0.02)	6e(2)	
(3)	Multiply line 6e(2) by line 6d	6e(3)	
(4)	Subtract line 6e(3) from line 6d	6e(4)	
f	If you did NOT complete line 6e, enter the amount from line 6d. If you completed line 6e, enter the amount from line 6e(4)	6f	
g	Applicable percentages. See instructions • If this is treated as the first or second year of the plan, enter the amount from line 6f. • If this is treated as the third year of the plan, multiply line 6f by 75% (0.75). • If this is treated as the fourth year of the plan, multiply line 6f by 50% (0.50). • If this is treated as the fifth year of the plan, multiply the amount on line 6f by 25% (0.25).	6g	
7	Credit for small employer pension plan startup costs from partnerships and S corporations	7	256
8	Add lines 5, 6g, and 7. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1j	8	2,308

Part II Small Employer Auto-Enrollment Credit

9	Enter \$500 if an auto-enrollment option is provided for retirement savings	9	
10	Small employer auto-enrollment credit from partnerships and S corporations	10	
11	Add lines 9 and 10. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1dd	11	3,911

Part III Military Spouse Participation Credit**Caution:** You can't claim the credit if you had more than 100 employees in the preceding tax year.

12	Enter the number of military spouse employees participating in an eligible plan. See instructions. X \$200	12	
13	Amount of contributions paid by employer for each eligible military spouse employee. Do not enter more than \$300 per employee. See instructions	13	
14	Credit for small employer military spouse retirement plan from partnerships and S corporations	14	
15	Add lines 12, 13, and 14. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1ee	15	25

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 33435N

Form **8881** (Rev. 12-2023)

Form **8881**
(Rev. December 2023)
Department of the Treasury
Internal Revenue Service
Name(s) shown on return

Credit for Small Employer Pension Plan Startup Costs, Auto-Enrollment, and Military Spouse Participation

Attach to your tax return.
Go to www.irs.gov/Form8881 for instructions and the latest information.

OMB No. 1545-1810

Attachment
Sequence No. **130**

Identifying number

Part I Credit for Small Employer Pension Plan Startup Costs (Including Employer Contributions)

A	Enter the number of qualifying employees. See instructions		
1	Qualified startup costs incurred during the tax year	1	5,855
2	Employers with 1-50 employees enter the amount from line 1. Employers with 51-100 employees enter 50% (0.50) of line 1	2	4,803
3	Enter the number of employees eligible to participate in the pension plan. See instructions. 30 X \$250	3	
4	Enter the greater of \$500 or the amount from line 3 (Do not enter more than \$5,000)	4	6,336
5	Enter the smaller of line 2 or line 4	5	2,985
6a	Enter the number of employees from the preceding tax year. See instructions	6a	
b	Enter employer contributions made to the plan, but don't include (i) elective deferrals, (ii) contributions made to employees whose wages paid to the employee were in excess of \$100,000 and (iii) any amount of contributions to an employee to whom you made contributions of more than \$1,000	6b	
c	For employees for whom you made matching and nonelective contributions of more than \$1,000, (and who are not disqualified because they meet 6b(ii) above), see the instructions for information on how to determine the amount to enter on line 6c. If you did not make this type of contributions, enter -0-	6c	
d	Add lines 6b and 6c If the number of employees entered on line 6a is 50 or less, enter the amount from line 6d on line 6f. If the number of employees entered on line 6a is 51-100, continue to line 6e(1).	6d	
e (1)	Subtract 50 (50.0) from the number of employees entered on line 6a	6e(1)	
(2)	Multiply line 6e(1) by 2% (0.02)	6e(2)	
(3)	Multiply line 6e(2) by line 6d	6e(3)	
(4)	Subtract line 6e(3) from line 6d	6e(4)	
f	If you did NOT complete line 6e, enter the amount from line 6d. If you completed line 6e, enter the amount from line 6e(4)	6f	
g	Applicable percentages. See instructions • If this is treated as the first or second year of the plan, enter the amount from line 6f. • If this is treated as the third year of the plan, multiply line 6f by 75% (0.75). • If this is treated as the fourth year of the plan, multiply line 6f by 50% (0.50). • If this is treated as the fifth year of the plan, multiply the amount on line 6f by 25% (0.25).	6g	
7	Credit for small employer pension plan startup costs from partnerships and S corporations	7	3,217
8	Add lines 5, 6g, and 7. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1j	8	10,664

Part II Small Employer Auto-Enrollment Credit

9	Enter \$500 if an auto-enrollment option is provided for retirement savings	9	
10	Small employer auto-enrollment credit from partnerships and S corporations	10	
11	Add lines 9 and 10. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1dd	11	1,639

Part III Military Spouse Participation Credit

Caution: You can't claim the credit if you had more than 100 employees in the preceding tax year.			
12	Enter the number of military spouse employees participating in an eligible plan. See instructions. X \$200	12	
13	Amount of contributions paid by employer for each eligible military spouse employee. Do not enter more than \$300 per employee. See instructions	13	
14	Credit for small employer military spouse retirement plan from partnerships and S corporations	14	
15	Add lines 12, 13, and 14. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1ee	15	9

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 33435N

Form **8881** (Rev. 12-2023)

TOTAL FORMS 8882 FILED: 217

TOTAL FORMS 8882 E-FILED: 217

Form **8882**

(Rev. December 2017)

Department of the Treasury
Internal Revenue Service**Credit for Employer-Provided Childcare
Facilities and Services**

▶ Attach to your tax return.

▶ Go to www.irs.gov/Form8882 for the latest information.

OMB No. 1545-1809

Attachment
Sequence No. **131**

Name(s) shown on return

Identifying number

1	Qualified childcare facility expenditures paid or incurred	1	107		
2	Enter 25% (0.25) of line 1	2		107	
3	Qualified childcare resource and referral expenditures paid or incurred	3	13		
4	Enter 10% (0.10) of line 3	4		13	
5	Credit for employer-provided childcare facilities and services from partnerships, S corporations, estates, and trusts	5		107	
6	Add lines 2, 4, and 5	6		217	
7	Enter the smaller of line 6 or \$150,000 . Estates and trusts, go to line 8. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, stop here and report this amount on Form 3800, Part III, line 1k	7		217	
8	Amount allocated to beneficiaries of the estate or trust (see instructions)	8			
9	Estates and trusts. Subtract line 8 from line 7. Report this amount on Form 3800, Part III, line 1k	9			

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

Employers use Form 8882 to claim the credit for qualified childcare facility and resource and referral expenditures. The credit is part of the general business credit. You may claim the credit any time within 3 years from the due date of your return on either an original or amended return.

Taxpayers, other than partnerships, S corporations, estates, or trusts, whose only source of this credit is from those pass-through entities, are not required to complete or file this form. Instead, they can report this credit directly on Form 3800.

How To Figure the Credit

The credit is 25% of the qualified childcare facility expenditures plus 10% of the qualified childcare resource and referral expenditures paid or incurred during the tax year. The credit is limited to \$150,000 per tax year.

Qualified childcare expenditures are amounts paid or incurred:

- To acquire, construct, rehabilitate, or expand property that:
 1. Is to be used as part of a qualified childcare facility of the taxpayer,
 2. Is depreciable (or amortizable) property, and
 3. Is not part of the principal residence of the taxpayer or any employee of the taxpayer;
- For the operating expenses of a qualified childcare facility of the taxpayer, including expenses for training of employees, scholarship programs, and providing

increased compensation to employees with higher levels of childcare training; or

- Under a contract with a qualified childcare facility to provide childcare services to employees of the taxpayer.

Note. Any expenses for childcare included in qualified childcare facility expenditures may not exceed the fair market value of such care.

A *qualified childcare facility* is a facility that meets the requirements of all applicable laws and regulations of the state or local government in which it is located, including the licensing of the facility as a childcare facility. The following conditions must also be met.

- The principal use of the facility must be to provide childcare (unless the facility is also the personal residence of the person operating the facility).
- Enrollment in the facility must be open to employees of the taxpayer during the tax year.
- If the facility is the principal trade or business of the taxpayer, at least 30% of the enrollees of the facility must be dependents of employees of the taxpayer.
- The use of the facility (or the eligibility to use the facility) must not discriminate in favor of highly compensated employees.

Qualified childcare resource and referral expenditures are amounts paid or incurred under a contract to provide childcare resource and referral services to employees of the taxpayer. The provision of the services (or the eligibility to use the services) must not discriminate in favor of highly compensated employees.

Form **8882**
(Rev. December 2017)Department of the Treasury
Internal Revenue Service**Credit for Employer-Provided Childcare
Facilities and Services**

► Attach to your tax return.

► Go to www.irs.gov/Form8882 for the latest information.

OMB No. 1545-1809

Attachment
Sequence No. **131**

Name(s) shown on return

Identifying number

1 Qualified childcare facility expenditures paid or incurred	1	33,724		
2 Enter 25% (0.25) of line 1	2		8,431	
3 Qualified childcare resource and referral expenditures paid or incurred	3	8,153		
4 Enter 10% (0.10) of line 3	4		815	
5 Credit for employer-provided childcare facilities and services from partnerships, S corporations, estates, and trusts	5		214	
6 Add lines 2, 4, and 5	6		9,460	
7 Enter the smaller of line 6 or \$150,000 . Estates and trusts, go to line 8. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, stop here and report this amount on Form 3800, Part III, line 1k	7		6,574	
8 Amount allocated to beneficiaries of the estate or trust (see instructions)	8			
9 Estates and trusts. Subtract line 8 from line 7. Report this amount on Form 3800, Part III, line 1k	9			

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

Employers use Form 8882 to claim the credit for qualified childcare facility and resource and referral expenditures. The credit is part of the general business credit. You may claim the credit any time within 3 years from the due date of your return on either an original or amended return.

Taxpayers, other than partnerships, S corporations, estates, or trusts, whose only source of this credit is from those pass-through entities, are not required to complete or file this form. Instead, they can report this credit directly on Form 3800.

How To Figure the Credit

The credit is 25% of the qualified childcare facility expenditures plus 10% of the qualified childcare resource and referral expenditures paid or incurred during the tax year. The credit is limited to \$150,000 per tax year.

Qualified childcare expenditures are amounts paid or incurred:

- To acquire, construct, rehabilitate, or expand property that:
 1. Is to be used as part of a qualified childcare facility of the taxpayer,
 2. Is depreciable (or amortizable) property, and
 3. Is not part of the principal residence of the taxpayer or any employee of the taxpayer;
- For the operating expenses of a qualified childcare facility of the taxpayer, including expenses for training of employees, scholarship programs, and providing

increased compensation to employees with higher levels of childcare training; or

- Under a contract with a qualified childcare facility to provide childcare services to employees of the taxpayer.

Note. Any expenses for childcare included in qualified childcare facility expenditures may not exceed the fair market value of such care.

A *qualified childcare facility* is a facility that meets the requirements of all applicable laws and regulations of the state or local government in which it is located, including the licensing of the facility as a childcare facility. The following conditions must also be met.

- The principal use of the facility must be to provide childcare (unless the facility is also the personal residence of the person operating the facility).
- Enrollment in the facility must be open to employees of the taxpayer during the tax year.
- If the facility is the principal trade or business of the taxpayer, at least 30% of the enrollees of the facility must be dependents of employees of the taxpayer.
- The use of the facility (or the eligibility to use the facility) must not discriminate in favor of highly compensated employees.

Qualified childcare resource and referral expenditures are amounts paid or incurred under a contract to provide childcare resource and referral services to employees of the taxpayer. The provision of the services (or the eligibility to use the services) must not discriminate in favor of highly compensated employees.

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 33436Y

Form **8882** (Rev. 12-2017)

TOTAL FORMS 8911 FILED: 1,004

TOTAL FORMS 8911 E-FILED: 999

Form 8911
(Rev. January 2023)
Department of the Treasury
Internal Revenue Service

Alternative Fuel Vehicle Refueling Property Credit

OMB No. 1545-0123

Attach to your tax return.

Go to www.irs.gov/Form8911 for instructions and the latest information.Attachment
Sequence No. **151**

Name(s) shown on return

Identifying number

Part I Total Cost of Refueling Property

1 Total cost of qualified alternative fuel vehicle refueling property placed in service during the tax year (see *What's New* in the instructions) **1** **599**

Part II Credit for Business/Investment Use Part of Refueling Property

2 Business/investment use part (see instructions) **2** **612**
3 Section 179 expense deduction (see instructions) **3** **0**
4a Subtract line 3 from line 2 **4a**
b Enter any amount included on line 4a attributable to property placed in service after 2022 as part of a project subject to project requirements that were not met (see instructions) **4b**
c Subtract line 4b from line 4a **4c**
5a Multiply line 4b by 6% (0.06) **5a**
b Multiply line 4c by 30% (0.30) **5b**
c Add lines 5a and 5b **5c**
6 Maximum business/investment use part of credit (see instructions) **6** **638**
7 Enter the **smaller** of line 5c or line 6 **7** **[d]**
8 Alternative fuel vehicle refueling property credit from partnerships and S corporations (see instructions) **8** **471**
9 **Business/investment use part of credit.** Add lines 7 and 8. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1s **9** **1,004**

Part III Credit for Personal Use Part of Refueling Property

10 Subtract line 2 from line 1. If zero, stop here; **do not** file this form unless you are claiming a credit on line 9 **10**
11 Multiply line 10 by 30% (0.30) **11**
12 Maximum personal use part of credit (see instructions) **12**
13 Enter the **smaller** of line 11 or line 12 **13**
14 Regular tax before credits:

- Individuals. Enter the sum of the amounts from Form 1040, 1040-SR, or 1040-NR, line 16, and Schedule 2 (Form 1040), line 2.
- Other filers. Enter the regular tax before credits from your return.

14
15 Credits that reduce regular tax before the alternative fuel vehicle refueling property credit:
a Foreign tax credit **15a**
b Certain allowable credits (see instructions) **15b**
c Add lines 15a and 15b **15c**
16 Net regular tax. Subtract line 15c from line 14. If zero or less, enter -0- and stop here; **do not** file this form unless you are claiming a credit on line 9 **16**
17 Tentative minimum tax (see instructions):

- Individuals. Enter the amount from Form 6251, line 9.
- Other filers. Enter the tentative minimum tax from your alternative minimum tax form or schedule.

17
18 Subtract line 17 from line 16. If zero or less, stop here; **do not** file this form unless you are claiming a credit on line 9 **18**
19 **Personal use part of credit.** Enter the **smaller** of line 13 or line 18 here and on Schedule 3 (Form 1040), line 6j; or the appropriate line of your return. If line 18 is smaller than line 13, see instructions **19**

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37721Q

Form **8911** (Rev. 1-2023)

Form **8911**
(Rev. January 2023)
Department of the Treasury
Internal Revenue Service

Alternative Fuel Vehicle Refueling Property Credit

Attach to your tax return.

Go to www.irs.gov/Form8911 for instructions and the latest information.

OMB No. 1545-0123

Attachment
Sequence No. **151**

Name(s) shown on return

Identifying number

Part I Total Cost of Refueling Property

1	Total cost of qualified alternative fuel vehicle refueling property placed in service during the tax year (see <i>What's New</i> in the instructions)	1	399,917
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Part II Credit for Business/Investment Use Part of Refueling Property

2	Business/investment use part (see instructions)	2	401,789
3	Section 179 expense deduction (see instructions)	3	0
4a	Subtract line 3 from line 2	4a	
b	Enter any amount included on line 4a attributable to property placed in service after 2022 as part of a project subject to project requirements that were not met (see instructions)	4b	
c	Subtract line 4b from line 4a	4c	
5a	Multiply line 4b by 6% (0.06)	5a	
b	Multiply line 4c by 30% (0.30)	5b	
c	Add lines 5a and 5b	5c	
6	Maximum business/investment use part of credit (see instructions)	6	73,042
7	Enter the smaller of line 5c or line 6	7	[d]
8	Alternative fuel vehicle refueling property credit from partnerships and S corporations (see instructions)	8	3,790
9	Business/investment use part of credit. Add lines 7 and 8. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1s	9	63,893

Part III Credit for Personal Use Part of Refueling Property

10	Subtract line 2 from line 1. If zero, stop here; do not file this form unless you are claiming a credit on line 9	10	
11	Multiply line 10 by 30% (0.30)	11	
12	Maximum personal use part of credit (see instructions)	12	
13	Enter the smaller of line 11 or line 12	13	
14	Regular tax before credits: • Individuals. Enter the sum of the amounts from Form 1040, 1040-SR, or 1040-NR, line 16, and Schedule 2 (Form 1040), line 2. • Other filers. Enter the regular tax before credits from your return.	14	
15	Credits that reduce regular tax before the alternative fuel vehicle refueling property credit:		
a	Foreign tax credit	15a	
b	Certain allowable credits (see instructions)	15b	
c	Add lines 15a and 15b	15c	
16	Net regular tax. Subtract line 15c from line 14. If zero or less, enter -0- and stop here; do not file this form unless you are claiming a credit on line 9	16	
17	Tentative minimum tax (see instructions): • Individuals. Enter the amount from Form 6251, line 9. • Other filers. Enter the tentative minimum tax from your alternative minimum tax form or schedule.	17	
18	Subtract line 17 from line 16. If zero or less, stop here; do not file this form unless you are claiming a credit on line 9	18	
19	Personal use part of credit. Enter the smaller of line 13 or line 18 here and on Schedule 3 (Form 1040), line 6j; or the appropriate line of your return. If line 18 is smaller than line 13, see instructions	19	

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37721Q

Form **8911** (Rev. 1-2023)

TOTAL FORMS 8925 FILED: 4,793

TOTAL FORMS 8925 E-FILED: 4,285

Form **8925**
(Rev. September 2017)
Department of the Treasury
Internal Revenue Service (99)

Report of Employer-Owned Life Insurance Contracts

OMB No. 1545-2089

▶ **Attach to the policyholder's tax return. See instructions.**
▶ **Go to www.irs.gov/Form8925 for the latest information.**

Attachment
Sequence No. **160**

Name(s) shown on return		Identifying number	
Name of policyholder, if different from above 1,733		Identifying number, if different from above 423	
Type of business 3,340			
1	Enter the number of employees the policyholder had at the end of the tax year	1	4,243
2	Enter the number of employees included on line 1 who were insured at the end of the tax year under the policyholder's employer-owned life insurance contract(s) issued after August 17, 2006. See <i>Section 1035 exchanges</i> on page 2 for an exception	2	4,146
3	Enter the total amount of employer-owned life insurance in force at the end of the tax year for employees who were insured under the contract(s) specified on line 2	3	4,529
4a	Does the policyholder have a valid consent for each employee included on line 2? See instructions <input checked="" type="checkbox"/> 3,894 *543 line 2? See instructions <input type="checkbox"/> Yes <input type="checkbox"/> No		
b	If "No," enter the number of employees included on line 2 for whom the policyholder does not have a valid consent	4b	[d]

Section references are to the Internal Revenue Code unless otherwise noted.

Future Developments

For the latest information about developments related to Form 8925 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/Form8925.

General Instructions**Purpose of Form**

Use Form 8925 to report the number of employees covered by employer-owned life insurance contracts issued after August 17, 2006, and the total amount of employer-owned life insurance in force on those employees at the end of the tax year. Policyholders must also indicate whether a valid consent has been received from each covered employee, and the number of covered employees for which a valid consent has not been received.

For more information, see sections 101(j) and 6039I, and Notice 2009-48, 2009-24 I.R.B. 1085, available at www.irs.gov/irb/2009-24_IRB/ar11.html.

Definitions

Employer-owned life insurance contract. For purposes of Form 8925, an insurance contract is an employer-owned life insurance contract if it is owned by a policyholder as defined below, and covers the life of the policyholder's employee(s) on the date the life insurance contract is issued. If you have master contracts, see section 101(j)(3) for additional information.

Policyholder. For purposes of Form 8925 and these instructions, a policyholder is an "applicable policyholder" as defined in section 101(j)(3)(B). Generally, a policyholder is the person who owns the employer-owned life insurance contract, and who is (a) engaged in a trade or business that employs the person insured under the employer-owned life insurance contract and (b) the direct or indirect beneficiary of the employer-owned life insurance contract.

Related person. A related person is considered a policyholder if that person is (a) related to the policyholder (defined earlier) under sections 267(b) or 707(b) (1), or (b) engaged in a trade or business under common control with the policyholder. See sections 52(a) and (b).

Employee. Employee includes an officer, director, or highly compensated employee under section 414(q).

Insured. An individual must be a U.S. citizen or resident to be considered insured under an employer-owned life insurance contract. Both individuals covered by a contract covering the joint lives of two individuals are considered insured.

Notice and consent requirements. To qualify as an employer-owned life insurance contract, the policyholder must meet the notice and consent requirements listed below before the issuance of the contract.

1. Provide written notification to the employee stating the policyholder intends to insure the employee's life and the maximum face amount for which the employee could be insured at the time the contract was issued.

The written notification must include a disclosure of the face amount of life insurance, either in dollars or as a multiple of salary, that the policyholder reasonably expects to purchase with regard to the employee during the course of the employee's tenure. Additional notice and consent are required if the aggregate face amount of the employer-owned life insurance contracts with regard to an employee exceeds the amount of which the employee was given notice and to which the employee consented. See Q&A-9 and Q&A-12 in Notice 2009-48.

2. Provide written notification to the employee that the policyholder will be a beneficiary of any proceeds payable upon the death of the employee.

3. Receive written consent from the employee. See *Valid consent* under the instructions for line 4a.

Electronic notification and consent.

The written notification and consent requirement can be met electronically only if the system for electronic notification and consent meets requirements 1 through 3, above. See Q&A-11 in Notice 2009-48 for more information.

Issue date of contract. Generally, the issue date of a life insurance contract is the date on the policy assigned by the insurance company on or after the date of application. For purposes of meeting the notice and consent requirements, the issue date of the employer-owned life insurance contract is the later of (1) the date of application of coverage, (2) the effective date of coverage, or (3) the formal issuance of the contract. See Q&A-4 in Notice 2009-48 for more information.

Form **8925**
(Rev. September 2017)
Department of the Treasury
Internal Revenue Service (99)

Report of Employer-Owned Life Insurance Contracts

OMB No. 1545-2089

▶ **Attach to the policyholder's tax return. See instructions.**
▶ **Go to www.irs.gov/Form8925 for the latest information.**

Attachment
Sequence No. **160**

Name(s) shown on return

Identifying number

Name of policyholder, if different from above

Identifying number, if different from above

Type of business

1	Enter the number of employees the policyholder had at the end of the tax year	1	720
2	Enter the number of employees included on line 1 who were insured at the end of the tax year under the policyholder's employer-owned life insurance contract(s) issued after August 17, 2006. See <i>Section 1035 exchanges</i> on page 2 for an exception	2	21
3	Enter the total amount of employer-owned life insurance in force at the end of the tax year for employees who were insured under the contract(s) specified on line 2	3	44,541,968
4a	Does the policyholder have a valid consent for each employee included on line 2? See instructions <input type="checkbox"/> Yes <input type="checkbox"/> No		
b	If "No," enter the number of employees included on line 2 for whom the policyholder does not have a valid consent	4b	[d]

Section references are to the Internal Revenue Code unless otherwise noted.

Future Developments

For the latest information about developments related to Form 8925 and its instructions, such as legislation enacted after they were published, go to www.irs.gov/Form8925.

General Instructions

Purpose of Form

Use Form 8925 to report the number of employees covered by employer-owned life insurance contracts issued after August 17, 2006, and the total amount of employer-owned life insurance in force on those employees at the end of the tax year. Policyholders must also indicate whether a valid consent has been received from each covered employee, and the number of covered employees for which a valid consent has not been received.

For more information, see sections 101(j) and 6039I, and Notice 2009-48, 2009-24 I.R.B. 1085, available at www.irs.gov/irb/2009-24_IRB/ar11.html.

Definitions

Employer-owned life insurance contract. For purposes of Form 8925, an insurance contract is an employer-owned life insurance contract if it is owned by a policyholder as defined below, and covers the life of the policyholder's employee(s) on the date the life insurance contract is issued. If you have master contracts, see section 101(j)(3) for additional information.

Policyholder. For purposes of Form 8925 and these instructions, a policyholder is an "applicable policyholder" as defined in section 101(j)(3)(B). Generally, a policyholder is the person who owns the employer-owned life insurance contract, and who is (a) engaged in a trade or business that employs the person insured under the employer-owned life insurance contract and (b) the direct or indirect beneficiary of the employer-owned life insurance contract.

Related person. A related person is considered a policyholder if that person is (a) related to the policyholder (defined earlier) under sections 267(b) or 707(b) (1), or (b) engaged in a trade or business under common control with the policyholder. See sections 52(a) and (b).

Employee. Employee includes an officer, director, or highly compensated employee under section 414(q).

Insured. An individual must be a U.S. citizen or resident to be considered insured under an employer-owned life insurance contract. Both individuals covered by a contract covering the joint lives of two individuals are considered insured.

Notice and consent requirements. To qualify as an employer-owned life insurance contract, the policyholder must meet the notice and consent requirements listed below before the issuance of the contract.

1. Provide written notification to the employee stating the policyholder intends to insure the employee's life and the maximum face amount for which the employee could be insured at the time the contract was issued.

The written notification must include a disclosure of the face amount of life insurance, either in dollars or as a multiple of salary, that the policyholder reasonably expects to purchase with regard to the employee during the course of the employee's tenure. Additional notice and consent are required if the aggregate face amount of the employer-owned life insurance contracts with regard to an employee exceeds the amount of which the employee was given notice and to which the employee consented. See Q&A-9 and Q&A-12 in Notice 2009-48.

2. Provide written notification to the employee that the policyholder will be a beneficiary of any proceeds payable upon the death of the employee.

3. Receive written consent from the employee. See *Valid consent* under the instructions for line 4a.

Electronic notification and consent.

The written notification and consent requirement can be met electronically only if the system for electronic notification and consent meets requirements 1 through 3, above. See Q&A-11 in Notice 2009-48 for more information.

Issue date of contract. Generally, the issue date of a life insurance contract is the date on the policy assigned by the insurance company on or after the date of application. For purposes of meeting the notice and consent requirements, the issue date of the employer-owned life insurance contract is the later of (1) the date of application of coverage, (2) the effective date of coverage, or (3) the formal issuance of the contract. See Q&A-4 in Notice 2009-48 for more information.

TOTAL FORMS 8936 FILED: 417

TOTAL FORMS 8936 E-FILED: 417

Form **8936**
Department of the Treasury
Internal Revenue Service
Name(s) shown on return

Clean Vehicle Credits

Attach to your tax return.
Go to www.irs.gov/Form8936 for instructions and the latest information.

OMB No. 1545-2137

2023
Attachment
Sequence No. **69**

Identifying number

Notes: • Complete a separate Schedule A (Form 8936) for each clean vehicle placed in service during the tax year.
• Individuals completing Parts II, III, or IV, must also complete Part I. See "Note" text below.

Part I Modified Adjusted Gross Income Amount

1a	Enter the amount from line 11 of your 2023 Form 1040, 1040-SR, or 1040-NR	1a		
b	Enter any income from Puerto Rico you excluded	1b		
c	Enter any amount from Form 2555, line 45	1c		
d	Enter any amount from Form 2555, line 50	1d		
e	Enter any amount from Form 4563, line 15	1e		
2	Add lines 1a through 1e		2	
3a	Enter the amount from line 11 of your 2022 Form 1040, 1040-SR, or 1040-NR	3a		
b	Enter any income from Puerto Rico you excluded	3b		
c	Enter any amount from Form 2555, line 45	3c		
d	Enter any amount from Form 2555, line 50	3d		
e	Enter any amount from Form 4563, line 15	3e		
4	Add lines 3a through 3e		4	
5	Enter the smaller of line 2 or line 4		5	

Part II Credit for Business/Investment Use Part of New Clean Vehicles

Note: Individuals can't claim a credit on line 6 if Part I, line 5, is more than \$150,000 (\$300,000 if married filing jointly or a qualifying surviving spouse; \$225,000 if head of household).

6	Enter the total credit amount figured in Part II of Schedule(s) A (Form 8936)	6		172
7	New clean vehicle credit from partnerships and S corporations (see instructions)	7		*7
8	Business/investment use part of credit. Add lines 6 and 7. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1y	8		178

Part III Credit for Personal Use Part of New Clean Vehicles

Note: You can't claim the Part III credit if Part I, line 5, is more than \$150,000 (\$300,000 if married filing jointly or a qualifying surviving spouse; \$225,000 if head of household).

9	Enter the total credit amount figured in Part III of Schedule(s) A (Form 8936)	9		
10	Enter the amount from Form 1040, 1040-SR, or 1040-NR, line 18	10		
11	Personal credits from Form 1040, 1040-SR, or 1040-NR (see instructions)	11		
12	Subtract line 11 from line 10. If zero or less, enter -0- and stop here. You can't claim the personal use part of the credit	12		
13	Personal use part of credit. Enter the smaller of line 9 or line 12 here and on Schedule 3 (Form 1040), line 6f. If line 12 is smaller than line 9, see instructions	13		

Part IV Credit for Previously Owned Clean Vehicles

Note: You can't claim the Part IV credit if Part I, line 5, is more than \$75,000 (\$150,000 if married filing jointly or a qualifying surviving spouse; \$112,500 if head of household).

14	Enter the total credit amount figured in Part IV of Schedule(s) A (Form 8936)	14		
15	Enter the amount from Form 1040, 1040-SR, or 1040-NR, line 18	15		
16	Personal credits from Form 1040, 1040-SR, or 1040-NR (see instructions)	16		
17	Subtract line 16 from line 15. If zero or less, enter -0- and stop here. You can't claim the Part IV credit	17		
18	Enter the smaller of line 14 or line 17 here and on Schedule 3 (Form 1040), line 6m. If line 17 is smaller than line 14, see instructions	18		

Part V Credit for Qualified Commercial Clean Vehicles

19	Enter the total credit amount figured in Part V of Schedule(s) A (Form 8936)	19		223
20	Qualified commercial clean vehicle credit from partnerships and S corporations (see instructions)	20		31
21	Add lines 19 and 20. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1aa	21		226

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37751E

Form **8936** (2023)

Form **8936**
 Department of the Treasury
 Internal Revenue Service
 Name(s) shown on return

Clean Vehicle Credits

Attach to your tax return.
 Go to www.irs.gov/Form8936 for instructions and the latest information.

OMB No. 1545-2137
2023
 Attachment
 Sequence No. **69**

Identifying number

Notes: • Complete a separate Schedule A (Form 8936) for each clean vehicle placed in service during the tax year.
 • Individuals completing Parts II, III, or IV, must also complete Part I. See "Note" text below.

Part I Modified Adjusted Gross Income Amount

1a	Enter the amount from line 11 of your 2023 Form 1040, 1040-SR, or 1040-NR	1a		
b	Enter any income from Puerto Rico you excluded	1b		
c	Enter any amount from Form 2555, line 45	1c		
d	Enter any amount from Form 2555, line 50	1d		
e	Enter any amount from Form 4563, line 15	1e		
2	Add lines 1a through 1e		2	
3a	Enter the amount from line 11 of your 2022 Form 1040, 1040-SR, or 1040-NR	3a		
b	Enter any income from Puerto Rico you excluded	3b		
c	Enter any amount from Form 2555, line 45	3c		
d	Enter any amount from Form 2555, line 50	3d		
e	Enter any amount from Form 4563, line 15	3e		
4	Add lines 3a through 3e		4	
5	Enter the smaller of line 2 or line 4		5	

Part II Credit for Business/Investment Use Part of New Clean Vehicles

Note: Individuals can't claim a credit on line 6 if Part I, line 5, is more than \$150,000 (\$300,000 if married filing jointly or a qualifying surviving spouse; \$225,000 if head of household).

6	Enter the total credit amount figured in Part II of Schedule(s) A (Form 8936)	6	290,059
7	New clean vehicle credit from partnerships and S corporations (see instructions)	7	*509
8	Business/investment use part of credit. Add lines 6 and 7. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1y	8	290,567

Part III Credit for Personal Use Part of New Clean Vehicles

Note: You can't claim the Part III credit if Part I, line 5, is more than \$150,000 (\$300,000 if married filing jointly or a qualifying surviving spouse; \$225,000 if head of household).

9	Enter the total credit amount figured in Part III of Schedule(s) A (Form 8936)	9	
10	Enter the amount from Form 1040, 1040-SR, or 1040-NR, line 18	10	
11	Personal credits from Form 1040, 1040-SR, or 1040-NR (see instructions)	11	
12	Subtract line 11 from line 10. If zero or less, enter -0- and stop here. You can't claim the personal use part of the credit	12	
13	Personal use part of credit. Enter the smaller of line 9 or line 12 here and on Schedule 3 (Form 1040), line 6f. If line 12 is smaller than line 9, see instructions	13	

Part IV Credit for Previously Owned Clean Vehicles

Note: You can't claim the Part IV credit if Part I, line 5, is more than \$75,000 (\$150,000 if married filing jointly or a qualifying surviving spouse; \$112,500 if head of household).

14	Enter the total credit amount figured in Part IV of Schedule(s) A (Form 8936)	14	
15	Enter the amount from Form 1040, 1040-SR, or 1040-NR, line 18	15	
16	Personal credits from Form 1040, 1040-SR, or 1040-NR (see instructions)	16	
17	Subtract line 16 from line 15. If zero or less, enter -0- and stop here. You can't claim the Part IV credit	17	
18	Enter the smaller of line 14 or line 17 here and on Schedule 3 (Form 1040), line 6m. If line 17 is smaller than line 14, see instructions	18	

Part V Credit for Qualified Commercial Clean Vehicles

19	Enter the total credit amount figured in Part V of Schedule(s) A (Form 8936)	19	46,315
20	Qualified commercial clean vehicle credit from partnerships and S corporations (see instructions)	20	3,345
21	Add lines 19 and 20. Partnerships and S corporations, stop here and report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 1aa	21	43,989

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37751E

Form **8936** (2023)

TOTAL FORMS 8990 FILED: 190,388

TOTAL FORMS 8990 E-FILED: 186,274

Form **8990**
(Rev. December 2022)
Department of the Treasury
Internal Revenue Service

Limitation on Business Interest Expense Under Section 163(j)

Attach to your tax return.

Go to www.irs.gov/Form8990 for instructions and the latest information.

OMB No. 1545-0123

Taxpayer name(s) shown on tax return

Identification number

A If Form 8990 relates to an information return for a foreign entity (for example, Form 5471), enter:

Name of foreign entity _____

Employer identification number, if any _____

Reference ID number _____

B Is the foreign entity a CFC group member? See instructions ☐ **Yes** ☐ **No****C** Is this Form 8990 filed by the specified group parent for an entire CFC group? See instructions ☐ **Yes** ☐ **No****D** Has a CFC or a CFC group made a safe harbor election? If yes, see instructions for which lines of Form 8990 to complete ☐ **Yes** ☐ **No****Part I Computation of Allowable Business Interest Expense***Part I is completed by all taxpayers subject to section 163(j). Schedule A and Schedule B need to be completed before Part I when the taxpayer is a partner or shareholder of a pass-through entity subject to section 163(j).***Section I—Business Interest Expense**

1	Current year business interest expense (not including floor plan financing interest expense), before the section 163(j) limitation	1	74,693	
2	Disallowed business interest expense carryforwards from prior years. (Does not apply to a partnership)	2	*50	
3	Partner's excess business interest expense treated as paid or accrued in current year (Schedule A, line 44, column (h))	3		
4	Floor plan financing interest expense. See instructions	4	2,348	
5	Total business interest expense. Add lines 1 through 4	5		78,107

Section II—Adjusted Taxable Income**Tentative Taxable Income**

6	Tentative taxable income. See instructions	6	187,289
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Additions (adjustments to be made if amounts are taken into account on line 6)

7	Any item of loss or deduction that is not properly allocable to a trade or business of the taxpayer. See instructions	7	16,430	
8	Any business interest expense not from a pass-through entity. See instructions	8	74,765	
9	Amount of any net operating loss deduction under section 172	9	*10	
10	Amount of any qualified business income deduction allowed under section 199A	10	*124	
11	Reserved for future use	11		
12	Amount of any loss or deduction items from a pass-through entity. See instructions	12	69,461	
13	Other additions. See instructions	13	9,350	
14	Total current year partner's excess taxable income (Schedule A, line 44, column (f))	14	23,715	
15	Total current year S corporation shareholder's excess taxable income (Schedule B, line 46, column (c))	15	0	
16	Total. Add lines 7 through 15	16		145,697

Reductions (adjustments to be made if amounts are taken into account on line 6)

17	Any item of income or gain that is not properly allocable to a trade or business of the taxpayer. See instructions	17	(44,384)	
18	Any business interest income not from a pass-through entity. See instructions	18	(25,128)	
19	Amount of any income or gain items from a pass-through entity. See instructions	19	(61,799)	
20	Other reductions. See instructions	20	(5,540)	
21	Total. Combine lines 17 through 20	21	(107,755)	
22	Adjusted taxable income. Combine lines 6, 16, and 21. See instructions	22		98,139

For Paperwork Reduction Act Notice, see the instructions.

Cat. No. 37814C

Form **8990** (Rev. 12-2022)

Form **8990**
(Rev. December 2022)
Department of the Treasury
Internal Revenue Service

Limitation on Business Interest Expense Under Section 163(j)

Attach to your tax return.

Go to www.irs.gov/Form8990 for instructions and the latest information.

OMB No. 1545-0123

Taxpayer name(s) shown on tax return

Identification number

A If Form 8990 relates to an information return for a foreign entity (for example, Form 5471), enter:

Name of foreign entity _____

Employer identification number, if any _____

Reference ID number _____

B Is the foreign entity a CFC group member? See instructions ☐ **Yes** ☐ **No**

C Is this Form 8990 filed by the specified group parent for an entire CFC group? See instructions ☐ **Yes** ☐ **No**

D Has a CFC or a CFC group made a safe harbor election? If yes, see instructions for which lines of Form 8990 to complete ☐ **Yes** ☐ **No**

Part I Computation of Allowable Business Interest Expense

Part I is completed by all taxpayers subject to section 163(j). Schedule A and Schedule B need to be completed before Part I when the taxpayer is a partner or shareholder of a pass-through entity subject to section 163(j).

Section I—Business Interest Expense

1	Current year business interest expense (not including floor plan financing interest expense), before the section 163(j) limitation	1	640,811,271	
2	Disallowed business interest expense carryforwards from prior years. (Does not apply to a partnership)	2	*262,348	
3	Partner's excess business interest expense treated as paid or accrued in current year (Schedule A, line 44, column (h))	3		
4	Floor plan financing interest expense. See instructions	4	1,627,419	
5	Total business interest expense. Add lines 1 through 4	5		349,667,083

Section II—Adjusted Taxable Income

Tentative Taxable Income

6	Tentative taxable income. See instructions	6	1,156,274,175
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Additions (adjustments to be made if amounts are taken into account on line 6)

7	Any item of loss or deduction that is not properly allocable to a trade or business of the taxpayer. See instructions	7	67,062,355	
8	Any business interest expense not from a pass-through entity. See instructions	8	347,250,413	
9	Amount of any net operating loss deduction under section 172	9	*17,769	
10	Amount of any qualified business income deduction allowed under section 199A	10	*46,173	
11	Reserved for future use	11		
12	Amount of any loss or deduction items from a pass-through entity. See instructions	12	357,198,639	
13	Other additions. See instructions	13	52,050,394	
14	Total current year partner's excess taxable income (Schedule A, line 44, column (f))	14	308,537,308	
15	Total current year S corporation shareholder's excess taxable income (Schedule B, line 46, column (c))	15	0	
16	Total. Add lines 7 through 15	16		1,132,809,176

Reductions (adjustments to be made if amounts are taken into account on line 6)

17	Any item of income or gain that is not properly allocable to a trade or business of the taxpayer. See instructions	17	(133,814,146)	
18	Any business interest income not from a pass-through entity. See instructions	18	(323,249,700)	
19	Amount of any income or gain items from a pass-through entity. See instructions	19	(829,982,666)	
20	Other reductions. See instructions	20	(27,054,705)	
21	Total. Combine lines 17 through 20	21	(1,314,392,413)	
22	Adjusted taxable income. Combine lines 6, 16, and 21. See instructions	22		1,245,364,925

For Paperwork Reduction Act Notice, see the instructions.

Cat. No. 37814C

Form **8990** (Rev. 12-2022)

Form 990 (Rev. 12-2022)

Page **2****Section III—Business Interest Income**

23	Current year business interest income. See instructions	23	31,005		
24	Excess business interest income from pass-through entities (total of Schedule A, line 44, column (g), and Schedule B, line 46, column (d))	24	14,007		
25	Total. Add lines 23 and 24	25			42,502

Section IV—163(j) Limitation Calculations**Limitation on Business Interest Expense**

26	Multiply the adjusted taxable income from line 22 by the applicable percentage. See instructions	26	98,360		
27	Business interest income (line 25)	27	42,507		
28	Floor plan financing interest expense (line 4)	28	2,348		
29	Total. Add lines 26, 27, and 28	29			112,489

Allowable Business Interest Expense

30	Total current year business interest expense deduction. See instructions	30			62,131
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Carryforward

31	Disallowed business interest expense. Subtract line 29 from line 5. (If zero or less, enter -0-.)	31			39,322
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Part II Partnership Pass-Through Items

Part II is only completed by a partnership that is subject to section 163(j). The partnership items below are allocated to the partners and are not carried forward by the partnership. See the instructions for more information.

Excess Business Interest Expense

32	Excess business interest expense. Enter amount from line 31	32			39,312
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Excess Taxable Income (If you entered an amount on line 32, skip lines 33 through 37.)

33	Subtract the sum of lines 4 and 25 from line 5. (If zero or less, enter -0-.)	33			31,104
34	Subtract line 33 from line 26. (If zero or less, enter -0-.)	34			73,604
35	Divide line 34 by line 26. Enter the result as a decimal. (If line 26 is zero, enter -0-.)	35			.76,447
36	Excess taxable income. Multiply line 35 by line 22	36			73,567

Excess Business Interest Income

37	Excess business interest income. Subtract the sum of lines 1, 2, and 3 from line 25. (If zero or less, enter -0-.)	37			28,631
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Part III S Corporation Pass-Through Items

Part III is only completed by S corporations that are subject to section 163(j). The S corporation items below are allocated to the shareholders. See the instructions for more information.

Excess Taxable Income

38	Subtract the sum of lines 4 and 25 from line 5. (If zero or less, enter -0-.)	38			0
39	Subtract line 38 from line 26. (If zero or less, enter -0-.)	39			0
40	Divide line 39 by line 26. Enter the result as a decimal. (If line 26 is zero, enter -0-.)	40			0
41	Excess taxable income. Multiply line 40 by line 22	41			0

Excess Business Interest Income

42	Excess business interest income. Subtract the sum of lines 1, 2, and 3 from line 25. (If zero or less, enter -0-.)	42			
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Section III—Business Interest Income

23	Current year business interest income. See instructions	23	330,727,289		
24	Excess business interest income from pass-through entities (total of Schedule A, line 44, column (g), and Schedule B, line 46, column (d))	24	79,949,041		
25	Total. Add lines 23 and 24	25		410,676,329	

Section IV—163(j) Limitation Calculations**Limitation on Business Interest Expense**

26	Multiply the adjusted taxable income from line 22 by the applicable percentage. See instructions	26	373,670,004		
27	Business interest income (line 25)	27	410,780,351		
28	Floor plan financing interest expense (line 4)	28	1,627,419		
29	Total. Add lines 26, 27, and 28	29		768,905,001	

Allowable Business Interest Expense

30	Total current year business interest expense deduction. See instructions	30		263,530,148	
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Carryforward

31	Disallowed business interest expense. Subtract line 29 from line 5. (If zero or less, enter -0-.)	31		90,910,567	
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Part II Partnership Pass-Through Items

Part II is only completed by a partnership that is subject to section 163(j). The partnership items below are allocated to the partners and are not carried forward by the partnership. See the instructions for more information.

Excess Business Interest Expense

32	Excess business interest expense. Enter amount from line 31	32		90,724,908	
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Excess Taxable Income (If you entered an amount on line 32, skip lines 33 through 37.)

33	Subtract the sum of lines 4 and 25 from line 5. (If zero or less, enter -0-.)	33	40,886,047		
34	Subtract line 33 from line 26. (If zero or less, enter -0-.)	34	299,250,963		
35	Divide line 34 by line 26. Enter the result as a decimal. (If line 26 is zero, enter -0-.)	35	0		
36	Excess taxable income. Multiply line 35 by line 22	36		994,842,376	

Excess Business Interest Income

37	Excess business interest income. Subtract the sum of lines 1, 2, and 3 from line 25. (If zero or less, enter -0-.)	37		219,477,739	
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Part III S Corporation Pass-Through Items

Part III is only completed by S corporations that are subject to section 163(j). The S corporation items below are allocated to the shareholders. See the instructions for more information.

Excess Taxable Income

38	Subtract the sum of lines 4 and 25 from line 5. (If zero or less, enter -0-.)	38	0		
39	Subtract line 38 from line 26. (If zero or less, enter -0-.)	39	0		
40	Divide line 39 by line 26. Enter the result as a decimal. (If line 26 is zero, enter -0-.)	40	0		
41	Excess taxable income. Multiply line 40 by line 22	41		0	

Excess Business Interest Income

42	Excess business interest income. Subtract the sum of lines 1, 2, and 3 from line 25. (If zero or less, enter -0-.)	42			
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TOTAL FORMS 8994 FILED: 620

TOTAL FORMS 8994 E-FILED: 612

Form 8994
(Rev. January 2021)
Department of the Treasury
Internal Revenue Service
Name(s) shown on return

Employer Credit for Paid Family and Medical Leave

▶ Attach to your tax return.

▶ Go to www.irs.gov/Form8994 for instructions and the latest information.

OMB No. 1545-2282

Attachment
Sequence No. **994**

Identifying number

- A** Do you have a written policy providing for at least 2 weeks of annual paid family and medical leave for your qualifying employee(s) to whom wages are paid (prorated for any part-time employees)? See instructions.
☐ **Yes.**
☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).
- B** Does the written policy provide paid family and medical leave of at least 50% of the wages normally paid to a qualifying employee? See instructions.
☐ **Yes.**
☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).
- C** Did you pay family and medical leave to at least one qualifying employee during the tax year? See instructions.
☐ **Yes.**
☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).
- D** If you employed at least one qualifying employee who was not covered by the Family and Medical Leave Act, did you include in your written policy and otherwise comply with “non-interference” language? See instructions.
☐ **Yes.**
☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).

1	Enter the total paid family and medical leave credit figured for wages paid during your tax year to your qualifying employee(s) while on family and medical leave (if you use the Paid Family and Medical Leave Credit Worksheet, the total from column (d)). See instructions for the adjustment you must make to your deduction for salaries and wages	1	173
2	Employer credit for paid family and medical leave from partnerships and S corporations (see instructions)	2	449
3	Add lines 1 and 2. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 4j	3	620

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37804G

Form **8994** (Rev. 1-2021)

Form 8994 (Rev. January 2021) Department of the Treasury Internal Revenue Service	Employer Credit for Paid Family and Medical Leave ► Attach to your tax return. ► Go to www.irs.gov/Form8994 for instructions and the latest information.	OMB No. 1545-2282 Attachment Sequence No. 994
Name(s) shown on return		Identifying number

- A** Do you have a written policy providing for at least 2 weeks of annual paid family and medical leave for your qualifying employee(s) to whom wages are paid (prorated for any part-time employees)? See instructions.
- ☐ **Yes.**
- ☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).
- B** Does the written policy provide paid family and medical leave of at least 50% of the wages normally paid to a qualifying employee? See instructions.
- ☐ **Yes.**
- ☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).
- C** Did you pay family and medical leave to at least one qualifying employee during the tax year? See instructions.
- ☐ **Yes.**
- ☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).
- D** If you employed at least one qualifying employee who was not covered by the Family and Medical Leave Act, did you include in your written policy and otherwise comply with "non-interference" language? See instructions.
- ☐ **Yes.**
- ☐ **No.** Stop. Do not file Form 8994 (see instructions for an exception that may apply to a partnership or S corporation).

1 Enter the total paid family and medical leave credit figured for wages paid during your tax year to your qualifying employee(s) while on family and medical leave (if you use the Paid Family and Medical Leave Credit Worksheet, the total from column (d)). See instructions for the adjustment you must make to your deduction for salaries and wages	1	6,096
2 Employer credit for paid family and medical leave from partnerships and S corporations (see instructions)	2	1,008
3 Add lines 1 and 2. Partnerships and S corporations, report this amount on Schedule K. All others, report this amount on Form 3800, Part III, line 4j	3	7,104

For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37804G

Form **8994** (Rev. 1-2021)

TOTAL FORMS 8996 FILED: 15,937

TOTAL FORMS 8996 E-FILED: 15,080

Form **8996**
(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

Qualified Opportunity Fund

► Go to www.irs.gov/Form8996 for instructions and the latest information.
► Attach to your tax return. See instructions.

OMB No. 1545-0123

Attachment
Sequence No. **996**

Name

Employer identification number

Part I General Information and Certification

- 1 Type of taxpayer: ☐ Corporation ☐ Partnership
- 2 Is the taxpayer organized for the purpose of investing in qualified opportunity zone (QOZ) property (other than another qualified opportunity fund (QOF))?
☐ **No. STOP.** Do not file this form with your tax return.
☐ **Yes.** Go to line 3.
- 3 Is this the first period the taxpayer is a QOF?
☐ **Yes.** By checking this box, you certify that by the end of the taxpayer's first QOF year, the taxpayer's organizing documents include a statement of the entity's purpose of investing in QOZ property and a description of the trade or business(es) that the QOF is engaged in either directly or through a QOZ business. See instructions.
☐ **No.**
- 4 If you checked "Yes" on line 3, provide the first month in which the fund chose to be a QOF ► _____
- 5 Did any investor dispose of, in part or in whole, their equity interest in the fund?
☐ **Yes.** Attach a statement with each investor's name, the date of disposal, and the interest that they transferred during the QOF's tax year.
☐ **No.**
- 6 ☒ Do not check this box. Reserved for future use.

Part II Investment Standard Calculation

7	Enter the amount from Part VI, line 2, for total QOZ property held by the taxpayer on the last day of the first 6-month period of the taxpayer's tax year. See instructions if Part I, line 3, is "Yes"	7	15,452
8	Total assets held by the taxpayer on the last day of the first 6-month period of the taxpayer's tax year. See instructions if Part I, line 3, is "Yes"	8	15,452
9	Divide line 7 by line 8	9	15,895
10	Enter the amount from Part VI, line 3, for total QOZ property held by the taxpayer on the last day of the taxpayer's tax year	10	14,775
11	Total assets held by the taxpayer on the last day of the taxpayer's tax year	11	15,911
12	Divide line 10 by line 11	12	14,775

Part III Qualified Opportunity Fund Average and Penalty

13	Add lines 9 and 12	13	15,911
14	Divide line 13 by 2.0. See instructions if Part I, line 3, is "Yes"	14	15,911
15	Is line 14 equal to or more than 0.90? <input type="checkbox"/> Yes. Enter -0- on this line and file this form with your tax return. <input type="checkbox"/> No. The fund has failed to maintain the investment standard. Complete Part IV to figure the penalty. Enter the penalty from line 8 of Part IV on this line. See instructions	15	*2,569

For Paperwork Reduction Act Notice, see your tax return instructions.

Cat. No. 37820G

Form **8996** (Rev. 12-2021)

Form **8996**
(Rev. December 2021)
Department of the Treasury
Internal Revenue Service

Qualified Opportunity Fund

► Go to www.irs.gov/Form8996 for instructions and the latest information.
► Attach to your tax return. See instructions.

OMB No. 1545-0123

Attachment
Sequence No. **996**

Name

Employer identification number

Part I General Information and Certification

- 1 Type of taxpayer: ☐ Corporation ☐ Partnership
- 2 Is the taxpayer organized for the purpose of investing in qualified opportunity zone (QOZ) property (other than another qualified opportunity fund (QOF))?
☐ **No. STOP.** Do not file this form with your tax return.
☐ **Yes.** Go to line 3.
- 3 Is this the first period the taxpayer is a QOF?
☐ **Yes.** By checking this box, you certify that by the end of the taxpayer's first QOF year, the taxpayer's organizing documents include a statement of the entity's purpose of investing in QOZ property and a description of the trade or business(es) that the QOF is engaged in either directly or through a QOZ business. See instructions.
☐ **No.**
- 4 If you checked "Yes" on line 3, provide the first month in which the fund chose to be a QOF ► _____
- 5 Did any investor dispose of, in part or in whole, their equity interest in the fund?
☐ **Yes.** Attach a statement with each investor's name, the date of disposal, and the interest that they transferred during the QOF's tax year.
☐ **No.**
- 6 ☐ Do not check this box. Reserved for future use.

Part II Investment Standard Calculation

7	Enter the amount from Part VI, line 2, for total QOZ property held by the taxpayer on the last day of the first 6-month period of the taxpayer's tax year. See instructions if Part I, line 3, is "Yes"	7	78,999,763
8	Total assets held by the taxpayer on the last day of the first 6-month period of the taxpayer's tax year. See instructions if Part I, line 3, is "Yes"	8	89,117,590
9	Divide line 7 by line 8	9	
10	Enter the amount from Part VI, line 3, for total QOZ property held by the taxpayer on the last day of the taxpayer's tax year	10	87,286,775
11	Total assets held by the taxpayer on the last day of the taxpayer's tax year	11	95,651,405
12	Divide line 10 by line 11	12	

Part III Qualified Opportunity Fund Average and Penalty

13	Add lines 9 and 12	13	
14	Divide line 13 by 2.0. See instructions if Part I, line 3, is "Yes"	14	
15	Is line 14 equal to or more than 0.90? <input type="checkbox"/> Yes. Enter -0- on this line and file this form with your tax return. <input type="checkbox"/> No. The fund has failed to maintain the investment standard. Complete Part IV to figure the penalty. Enter the penalty from line 8 of Part IV on this line. See instructions	15	*273,286

For Paperwork Reduction Act Notice, see your tax return instructions.

Cat. No. 37820G

Form **8996** (Rev. 12-2021)

Form 8996 (Rev. 12-2021)

Page **3****Part V QOZ Business Property—Directly Owned or Leased by Taxpayer**

Enter every QOZ where QOZ business property directly owned or leased by the taxpayer is located

QOZ business property held directly on last day of the first 6-month period of the tax year

QOZ business property held directly on last day of the tax year

(a) QOZ No.	(b) Owned Property Value	(c) Leased Property Value	(d) Owned Property Value	(e) Leased Property Value
[3]				
3,321	2,146	0	2,172	0
1 If the taxpayer directly owned/leased QOZ business property used in one or more QOZs, see instructions and enter the total QOZ business property value from the separate statement				

Part VI QOZ Stock or Partnership Interests

For every QOZ business in which the taxpayer holds stock or a partnership interest, enter every QOZ in which the tangible property of the QOZ business is located and the EIN of that QOZ business

Value of QOZ stock or partnership interest held on last day of the first 6-month period of the tax year apportioned to each QOZ

Tangible property held by QOZ business on last day of the first 6-month period of the tax year

Value of QOZ stock or partnership interest held on last day of the tax year apportioned to each QOZ

Tangible property held by QOZ business on last day of the tax year

(a) QOZ No. (indicate non-QOZs by 9999999999)	(b) EIN of QOZ Business	(c) Investment Value	(d) Owned Property Value	(e) Leased Property Value	(f) Investment Value	(g) Owned Property Value	(h) Leased Property Value
[3]							
26,402	26,402	25,133	21,267	1,676	24,908	20,643	1,676
[3] The counts on this page represent the sum of the number of rows filed rather than the number of forms which have Part V or Part VI completed.							
1 If additional lines are needed, see instructions and enter total QOZ business value held by the taxpayer from Part VII, line 2, columns (c) and (f)							
2 6-month test QOZ property. Add Part V, columns (b) and (c), and Part VI, column (c). Enter the total here and on Part II, line 7							
3 Year-end test QOZ property. Add Part V, columns (d) and (e), and Part VI, column (f). Enter the total here and on Part II, line 10							
4 Type of accounting method used to value the property listed on this form.							

2,556

11,465

☐ Applicable financial statement valuation method.☐ Alternative valuation method.Form **8996** (Rev. 12-2021)

Form 8996 (Rev. 12-2021)

Page **3****Part V QOZ Business Property—Directly Owned or Leased by Taxpayer**

Enter every QOZ where QOZ business property directly owned or leased by the taxpayer is located

QOZ business property held directly on last day of the first 6-month period of the tax year

QOZ business property held directly on last day of the tax year

(a) QOZ No.	(b) Owned Property Value	(c) Leased Property Value	(d) Owned Property Value	(e) Leased Property Value
	11,432,327	0	11,977,998	0
1 If the taxpayer directly owned/leased QOZ business property used in one or more QOZs, see instructions and enter the total QOZ business property value from the separate statement				

Part VI QOZ Stock or Partnership Interests

For every QOZ business in which the taxpayer holds stock or a partnership interest, enter every QOZ in which the tangible property of the QOZ business is located and the EIN of that QOZ business

Value of QOZ stock or partnership interest held on last day of the first 6-month period of the tax year apportioned to each QOZ

Tangible property held by QOZ business on last day of the first 6-month period of the tax year

Value of QOZ stock or partnership interest held on last day of the tax year apportioned to each QOZ

Tangible property held by QOZ business on last day of the tax year

(a) QOZ No. (indicate non-QOZs by 9999999999)	(b) EIN of QOZ Business	(c) Investment Value	(d) Owned Property Value	(e) Leased Property Value	(f) Investment Value	(g) Owned Property Value	(h) Leased Property Value
		66,702,775	101,397,448	43,584,943	72,592,268	119,230,941	43,646,545

1 If additional lines are needed, see instructions and enter total QOZ business value held by the taxpayer from Part VII, line 2, columns (c) and (f)**2** 6-month test QOZ property. Add Part V, columns (b) and (c), and Part VI, column (c). Enter the total here and on Part II, line 7**3** Year-end test QOZ property. Add Part V, columns (d) and (e), and Part VI, column (f). Enter the total here and on Part II, line 10**4** Type of accounting method used to value the property listed on this form.☐ Applicable financial statement valuation method.☐ Alternative valuation method.Form **8996** (Rev. 12-2021)