

This ATS Scenario should only be used if supporting Form 8975

Date: 10/20/2020

Tax Year 2020
1041 MeF ATS Scenario 6
Red Apples Trust
00-4000666

Please Note: Form 8975 Schedule A, Part II, Line 1 accepts addresses per the form instructions. Part II, Line 2 accepts one or more entity identification numbers, such as a company registration number for the constituent entity when filed electronically

Forms Included in Scenario 6

Form 1041
Schedule I (Form1041)
Schedule C (Form1040)
Schedule D (Form 1041)
Form 4797
Form 8858
Form 8960
8975
8975 – Schedule A (3)
Form 8453-FE
Schedule K-1 (4)

Taxpayer Name, Address, and TIN

Red Apples Trust
5 Test Street
Lanham, MD 20706
00-4000666

Signature Information

Practitioner Signature PIN Method

K1 Data

- Interest Income must be distributed equally to the beneficiaries
- Ordinary Dividends must be distributed equally to the beneficiaries
- Schedule C Income must be distributed equally to the beneficiaries

Form 8995 or Form 8995-A is not required for this scenario.

Tax Exempt Expense Allocation Statement

Expense	Total Expenses	Amount Allocated to Tax Exempt Income	Amount Allocated to Taxable Income	Explanation
Expense 2	1,000,000	400,000	600,000	Test scenario data only
Expense 2	1,000,000	100,000	900,000	Test scenario data only
Total	2,000,000	500,000	1,500,000	

A Check all that apply: Decedent's estate, Simple trust, Complex trust, Qualified disability trust, ESBT (S portion only), Grantor type trust, Bankruptcy estate—ch. 7, Bankruptcy estate—other, Pooled income fund.
For calendar year 2020 or fiscal year beginning January 1, 2020, and ending December 31, 2020.
Name of estate or trust (If a grantor type trust, see the instructions.) RED APPLES TRUST
Name and title of fiduciary KIM APPLES, CPA
Number, street, and room or suite no. (If a P.O. box, see the instructions.) 5 Trust Street
City or town, state or province, country, and ZIP or foreign postal code Lanham, MD 20706
C Employer identification number 00-4000666
D Date entity created January 2, 2020
F Check applicable boxes: Initial return, Final return, Amended return, Net operating loss carryback, Change in trust's name, Change in fiduciary, Change in fiduciary's name, Change in fiduciary's address.
G Check here if the estate or filing trust made a section 645 election. Trust TIN

Table with 30 rows and 2 columns. Rows include Income (Interest income, Dividends, Business income, etc.), Deductions (Interest, Taxes, Fiduciary fees, etc.), and Tax and Payments (Taxable income, Total tax, Total payments, etc.).

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 taxpayer) is based on all information of which preparer has any knowledge.
Signature of fiduciary or officer representing fiduciary, Date, EIN of fiduciary if a financial institution.
May the IRS discuss this return with the preparer shown below? See instructions. Yes No

Paid Preparer Use Only
Print/Type preparer's name, Preparer's signature, Date, Check if self-employed, PTIN, Firm's name, Firm's EIN, Firm's address, Phone no.

Schedule A Charitable Deduction. Don't complete for a simple trust or a pooled income fund.

1	Amounts paid or permanently set aside for charitable purposes from gross income. See instructions	1	
2	Tax-exempt income allocable to charitable contributions. See instructions	2	
3	Subtract line 2 from line 1	3	
4	Capital gains for the tax year allocated to corpus and paid or permanently set aside for charitable purposes	4	
5	Add lines 3 and 4	5	
6	Section 1202 exclusion allocable to capital gains paid or permanently set aside for charitable purposes. See instructions	6	
7	Charitable deduction. Subtract line 6 from line 5. Enter here and on page 1, line 13	7	

Schedule B Income Distribution Deduction

1	Adjusted total income. See instructions	1	822,320,000
2	Adjusted tax-exempt interest	2	500,000
3	Total net gain from Schedule D (Form 1041), line 19, column (1). See instructions	3	
4	Enter amount from Schedule A, line 4 (minus any allocable section 1202 exclusion)	4	
5	Capital gains for the tax year included on Schedule A, line 1. See instructions	5	
6	Enter any gain from page 1, line 4, as a negative number. If page 1, line 4, is a loss, enter the loss as a positive number	6	-94,000,000
7	Distributable net income. Combine lines 1 through 6. If zero or less, enter -0-	7	728,820,000
8	If a complex trust, enter accounting income for the tax year as determined under the governing instrument and applicable local law	8	
9	Income required to be distributed currently	9	728,820,000
10	Other amounts paid, credited, or otherwise required to be distributed	10	
11	Total distributions. Add lines 9 and 10. If greater than line 8, see instructions	11	728,820,000
12	Enter the amount of tax-exempt income included on line 11	12	500,000
13	Tentative income distribution deduction. Subtract line 12 from line 11	13	728,320,000
14	Tentative income distribution deduction. Subtract line 2 from line 7. If zero or less, enter -0-	14	728,320,000
15	Income distribution deduction. Enter the smaller of line 13 or line 14 here and on page 1, line 18	15	728,320,000

Schedule G Tax Computation and Payments (see instructions)

Part I – Tax Computation

1	Tax:		
a	Tax on taxable income. See instructions	1a	18,798,885
b	Tax on lump-sum distributions. Attach Form 4972	1b	
c	Alternative minimum tax (from Schedule I (Form 1041), line 54)	1c	60
d	Total. Add lines 1a through 1c	1d	18,798,945
2a	Foreign tax credit. Attach Form 1116	2a	
b	General business credit. Attach Form 3800	2b	
c	Credit for prior year minimum tax. Attach Form 8801	2c	
d	Bond credits. Attach Form 8912	2d	
e	Total credits. Add lines 2a through 2d	2e	
3	Subtract line 2e from line 1d. If zero or less, enter -0-	3	18,798,945
4	Tax on the ESBT portion of the trust (from ESBT Tax Worksheet, line 17). See instructions	4	
5	Net investment income tax from Form 8960, line 21	5	0
6	Recapture taxes. Check if from: <input type="checkbox"/> Form 4255 <input type="checkbox"/> Form 8611	6	
7	Household employment taxes. Attach Schedule H (Form 1040)	7	
8	Other taxes and amounts due	8	
9	Total tax. Add lines 3 through 8. Enter here and on page 1, line 24	9	18,798,945

Part II – Payments

10	2020 estimated tax payments and amount applied from 2019 return	10	
11	Estimated tax payments allocated to beneficiaries (from Form 1041-T)	11	
12	Subtract line 11 from line 10	12	
13	Tax paid with Form 7004. See instructions	13	
14	Federal income tax withheld. If any is from Form(s) 1099, check here <input type="checkbox"/>	14	
15	2020 net 965 tax liability from Form 965-A, Part I, column (f), line 4	15	
16	Other payments: a Form 2439 ; b Form 4136 ; Total	16c	
17	Refundable credit for qualified sick and family leave. Attach Schedule H (Form 1040)	17	
18	Deferral. If filing Schedule H (Form 1040), see instructions for amount to enter	18	
19	Total payments. Add lines 12 through 15 and 16c through 18. Enter here and on page 1, line 26	19	

Other Information

Yes No

- 1** Did the estate or trust receive tax-exempt income? If "Yes," attach a computation of the allocation of expenses.
Enter the amount of tax-exempt interest income and exempt-interest dividends ▶ \$ 1,000,000
- 2** Did the estate or trust receive all or any part of the earnings (salary, wages, and other compensation) of any individual by reason of a contract assignment or similar arrangement?
- 3** At any time during calendar year 2020, did the estate or trust have an interest in or a signature or other authority over a bank, securities, or other financial account in a foreign country?
See the instructions for exceptions and filing requirements for FinCEN Form 114. If "Yes," enter the name of the foreign country ▶ _____
- 4** During the year, did the estate or trust receive a contribution from, or was it the grantor of, a transferor to, a foreign trust? If "Yes," the estate or trust may have to file Form 3520. See instructions
- 5** Did the estate or trust receive, or pay, any qualified residence interest on seller-provided financing? If "Yes," see the instructions for the required attachment
- If this is a estate or a complex trust making the section 66(b) election, check here. See instructions ▶
- 7** To make a section 13(e)(3) election, attach Schedule (Form 1041), and check here. See instructions ▶
- 8** If the decedent's estate has been open for more than 2 years, attach an explanation for the delay in closing the estate, and check here ▶
- 9** Are any present or future beneficiaries skip persons? See instructions
- 10** Was the trust a specified domestic entity required to file Form 9938 for the tax year (see the instructions for Form 9938)?
- 11a** Did the estate or trust distribute S corporation stock for which it made a section 965(i) election?
- b** If "Yes," did each beneficiary enter into an agreement to be liable for the net tax liability? See instructions
- 12** Did the estate or trust make a section 965(i) election for S corporation stock held on the last day of the tax year? See instructions
- 13** **ESBTs only.** Does the ESBT have a nonresident alien grantor? If "Yes," see instructions
- 14** **ESBTs only.** Did the S portion of the trust claim a qualified business income deduction? If "Yes," see instructions

DRAFT AS OF
September 10, 2020
DO NOT FILE

**SCHEDULE I
(Form 1041)**

Alternative Minimum Tax—Estates and Trusts

OMB No. 1545-0092

Department of the Treasury
Internal Revenue Service

▶ Attach to Form 1041.

2020

▶ Go to www.irs.gov/Form1041 for instructions and the latest information.

Name of estate or trust

Employer identification number

Part I Estate's or Trust's Share of Alternative Minimum Taxable Income

1	Adjusted taxable income (loss) (from Form 1041, line 17), ESBTs, see instructions	1	822,320,000
2	Interest	2	
3	Taxes	3	
4	Refund of taxes	4	()
5	Depletion (difference between regular tax and AMT)	5	
6	Net operating loss deduction. Enter as a positive amount	6	
7	Interest from specified private activity bonds exempt from the regular tax	7	
8	Qualified small business stock (see instructions)	8	
9	Exercise of incentive stock options (excess of AMT income over regular tax income)	9	
10	Other estates and trusts (amount from Schedule K-1 (Form 1041), box 12, code A)	10	
11	Disposition of property (difference between AMT and regular tax gain or loss)	11	
12	Depreciation (losses plus depreciation service center 186 (losses) on regular tax and AMT)	12	
13	Passive activities (difference between AMT and regular tax income or loss)	13	
14	Loss limitations (difference between AMT and regular tax income or loss)	14	
15	Circulation costs (difference between regular tax and AMT)	15	
16	Long-term contracts (difference between AMT and regular tax income)	16	
17	Mining costs (difference between regular tax and AMT)	17	
18	Research and experimental costs (difference between regular tax and AMT)	18	
19	Income from certain installment sales before January 1, 1987	19	()
20	Intangible drilling costs preference	20	
21	Other adjustments, including income-based related adjustments	21	
22	Alternative tax net operating loss deduction (See the instructions for the limitation that applies.)	22	()
23	Adjusted alternative minimum taxable income. Combine lines 1 through 22	23	822,320,000
Note: Complete Part II below before going to line 24.			
24	Income distribution deduction from Part II, line 42	24	728,320,000
25	Estate tax deduction (from Form 1041, line 19)	25	
26	Add lines 24 and 25	26	728,320,000
27	Estate's or trust's share of alternative minimum taxable income. Subtract line 26 from line 23	27	94,000,000

If line 27 is:

- \$25,400 or less, stop here and enter -0- on Form 1041, Schedule G, line 1c. The estate or trust isn't liable for the alternative minimum tax.
- Over \$25,400, but less than \$186,400, go to line 43.
- \$186,400 or more, enter the amount from line 27 on line 49 and go to line 50.
- **ESBTs**, see instructions.

Part II Income Distribution Deduction on a Minimum Tax Basis

28	Adjusted alternative minimum taxable income (see instructions)	28	822,320,000
29	Adjusted tax-exempt interest (other than amounts included on line 7)	29	500,000
30	Total net gain from Schedule D (Form 1041), line 19, column (1). If a loss, enter -0-	30	
31	Capital gains for the tax year allocated to corpus and paid or permanently set aside for charitable purposes (from Form 1041, Schedule A, line 4)	31	
32	Capital gains paid or permanently set aside for charitable purposes from gross income (see instructions)	32	
33	Capital gains computed on a minimum tax basis included on line 23	33	(94,000,000)
34	Capital losses computed on a minimum tax basis included on line 23. Enter as a positive amount	34	
35	Distributable net alternative minimum taxable income (DNAMTI). Combine lines 28 through 34. If zero or less, enter -0-	35	728,820,000
36	Income required to be distributed currently (from Form 1041, Schedule B, line 9)	36	728,820,000
37	Other amounts paid, credited, or otherwise required to be distributed (from Form 1041, Schedule B, line 10)	37	
38	Total distributions. Add lines 36 and 37	38	728,820,000
39	Tax-exempt income included on line 38 (other than amounts included on line 7)	39	500,000
40	Tentative income distribution deduction on a minimum tax basis. Subtract line 39 from line 38	40	728,320,000

Part II Income Distribution Deduction on a Minimum Tax Basis (continued)

41	Tentative income distribution deduction on a minimum tax basis. Subtract line 29 from line 35. If zero or less, enter -0-	41	728,320,000
42	Income distribution deduction on a minimum tax basis. Enter the smaller of line 40 or line 41. Enter here and on line 24	42	728,320,000

Part III Alternative Minimum Tax

43	Exemption amount	43	\$25,400
44	Enter the amount from line 27	44	94,000,000
45	Phase-out of exemption amount	45	\$84,800
46	Subtract line 45 from line 44. If zero or less, enter -0-	46	93,915,200
47	Multiply line 46 by 25% (0.25)	47	23,478,800
48	Subtract line 47 from line 43. If zero or less, enter -0-	48	0
49	Subtract line 48 from line 44	49	94,000,000
50	Go to Part IV of Schedule I to figure line 50 if the estate or trust has qualified dividends or has a gain on lines 18a and 19 of column (2) of Schedule D (Form 1041) (as refigured for the AMT, if necessary). Otherwise, if line 49 is: <ul style="list-style-type: none"> • \$197,900 or less, multiply line 49 by 26% (0.26). • Over \$197,900, multiply line 49 by 28% (0.28) and subtract \$3,958 from the result 	50	18,798,945
51	Alternative minimum foreign tax credit (see instructions)	51	0
52	Tentative minimum tax. Subtract line 51 from line 50	52	18,798,945
53	Enter the tax from Form 1041, Schedule G, line 1a (minus any foreign tax credit from Schedule G, line 2a)	53	18,798,885
54	Alternative minimum tax. Subtract line 53 from line 52. If zero or less, enter -0-. Enter here and on Form 1041, Schedule G, line 1c	54	60

Part IV Line 50 Computation Using Maximum Capital Gains Rates

Caution: If you didn't complete Part V of Schedule D (Form 1041), the Schedule D Tax Worksheet, or the Qualified Dividends Tax Worksheet in the Instructions for Form 1041, see the instructions before completing this part.

55	Enter the amount from line 49	55	94,000,000
56	Enter the amount from line 26 of Schedule D (Form 1041), line 13 of the Schedule D Tax Worksheet, or line 4 of the Qualified Dividends Tax Worksheet in the Instructions for Form 1041, whichever applies (as refigured for the AMT, if necessary)	56	94,000,000
57	Enter the amount from Schedule D (Form 1041), line 18b, column (2) (as refigured for the AMT, if necessary). If you didn't complete Schedule D for the regular tax or the AMT, enter -0-	57	0
58	If you didn't complete a Schedule D Tax Worksheet for the regular tax or the AMT, enter the amount from line 56. Otherwise, add lines 56 and 57 and enter the smaller of that result or the amount from line 10 of the Schedule D Tax Worksheet (as refigured for the AMT, if necessary)	58	94,000,000
59	Enter the smaller of line 55 or line 58	59	94,000,000
60	Subtract line 59 from line 55	60	0
61	If line 60 is \$197,900 or less, multiply line 60 by 26% (0.26). Otherwise, multiply line 60 by 28% (0.28) and subtract \$3,958 from the result	61	0
62	Maximum amount subject to the 0% rate	62	\$2,650
63	Enter the amount from line 27 of Schedule D (Form 1041), line 14 of the Schedule D Tax Worksheet, or line 5 of the Qualified Dividends Tax Worksheet in the Instructions for Form 1041, whichever applies (as figured for the regular tax). If you didn't complete Schedule D or either worksheet for the regular tax, enter the amount from Form 1041, line 23; if zero or less, enter -0-	63	0
64	Subtract line 63 from line 62. If zero or less, enter -0-	64	2,650
65	Enter the smaller of line 55 or line 56	65	94,000,000
66	Enter the smaller of line 64 or line 65. This amount is taxed at 0%	66	2,650
67	Subtract line 66 from line 65	67	93,997,350

Part IV Line 50 Computation Using Maximum Capital Gains Rates (continued)

68	Maximum amount subject to rates below 20%	68	\$ 13,150	
69	Enter the amount from line 64	69	2,650	
70	Enter the amount from line 27 of Schedule D (Form 1041), line 18 of the Schedule D Tax Worksheet, or line 5 of the Qualified Dividends Tax Worksheet, whichever applies (as figured for the regular tax). If you didn't complete Schedule D or either worksheet for the regular tax, enter the amount from Form 1041, line 23; if zero or less, enter -0-	70	0	
71	Add line 69 and line 70	71	2,650	
72	Subtract line 71 from line 68. If zero or less, enter -0-	72	10,500	
73	Enter the smaller of line 67 or 72	73	10,500	
74	Multiply line 73 by 15% (0.15)	74	1,575	
75	Add lines 66 and 73	75	13,150	
If lines 75 and 55 are the same, skip lines 76 through 80 and go to line 81. Otherwise, go to line 76.				
76	Subtract line 75 from line 65	76	93,986,850	
77	Multiply line 76 by 20% (0.20)	77	18,797,370	
If line 57 is zero or blank, skip lines 78 through 80 and go to line 81. Otherwise, go to line 78.				
78	Add lines 60, 76	78		
79	Subtract line 78 from line 55	79		
80	Multiply line 79 by 25% (0.25)	80		
81	Add lines 61, 74, 77, and 80	81	18,798,945	
82	If line 55 is \$197,900 or less, multiply line 55 by 26% (0.26). Otherwise, multiply line 55 by 28% (0.28) and subtract \$3,958 from the result	82	26,316,042	
83	Enter the smaller of line 81 or line 82 here and on line 50	83	18,798,945	

**SCHEDULE C
(Form 1040)**

**Profit or Loss From Business
(Sole Proprietorship)**

OMB No. 1545-0074

2020
Attachment
Sequence No. **09**

Department of the Treasury
Internal Revenue Service (99)

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

▶ Attach to Form 1040, 1040-SR, 1040-NR, or 1041; partnerships generally must file Form 1065.

Name of proprietor

RED APPLES TRUST

Social security number (SSN)

A Principal business or profession, including product or service (see instructions)

Goods and Services

B Enter code from instructions

▶ 5 6 1 6 0 0

C Business name. If no separate business name, leave blank.

Red Apples Convenient Store

D Employer ID number (EIN) (see instr.)

0 0 4 0 0 0 6 6 6

E Business address (including suite or room no.) ▶

City, town or post office, state, and ZIP code

F Accounting method: (1) Cash (2) Accrual (3) Other (specify) ▶

G Did you "materially participate" in the operation of this business during 2020? If "No," see instructions for limit on losses Yes No

H If you started or acquired this business during 2020, check here

I Did you make any payments in 2020 that would require you to file Form(s) 1099? See instructions Yes No

J If "Yes," did you or will you file required Form(s) 1099? Yes No

Part I Income

1	Gross receipts (see instructions for line 1 and check the box with income will report on Form W-2 and the "State employee" box if that term was checked) <input type="checkbox"/>		130,000,000
2	Returns and allowances	2	10,000,000
3	Subtract line 2 from line 1	3	120,000,000
4	Cost of goods sold (from line 42)	4	48,500,000
5	Gross profit. Subtract line 4 from line 3	5	71,500,000
6	Other income, including federal and state gasoline or fuel tax credit or refund (see instructions)	6	
7	Gross income. Add lines 5 and 6	7	71,500,000

Part II Expenses. Enter expenses for business use of your home **only** on line 30.

8	Advertising	8	5,000,000	18	Office expense (see instructions)	18	
9	Car and truck expenses (see instructions)	9	7,000,000	19	Pension and profit-sharing plans	19	
10	Commissions and fees	10		20	Rent or lease (see instructions):		
11	Contract labor (see instructions)	11		a	Vehicles, machinery, and equipment	20a	
12	Depletion	12		b	Other business property	20b	20,000,000
13	Depreciation and section 179 expense deduction (not included in Part III) (see instructions)	13		21	Repairs and maintenance	21	5,000,000
14	Employee benefit programs (other than on line 19)	14		22	Supplies (not included in Part III)	22	
15	Insurance (other than health)	15		23	Taxes and licenses	23	
16	Interest (see instructions):			24	Travel and meals:		
a	Mortgage (paid to banks, etc.)	16a		a	Travel	24a	
b	Other	16b		b	Deductible meals (see instructions)	24b	
17	Legal and professional services	17	10,000,000	25	Utilities	25	6,000,000
28	Total expenses before expenses for business use of home. Add lines 8 through 27a	28	53,500,000	26	Wages (less employment credits)	26	
29	Tentative profit or (loss). Subtract line 28 from line 7	29	18,000,000	27a	Other expenses (from line 48)	27a	
30	Expenses for business use of your home. Do not report these expenses elsewhere. Attach Form 8829 unless using the simplified method. See instructions. Simplified method filers only: Enter the total square footage of (a) your home: _____ and (b) the part of your home used for business: _____. Use the Simplified Method Worksheet in the instructions to figure the amount to enter on line 30	30		27b	Reserved for future use	27b	
31	Net profit or (loss). Subtract line 30 from line 29. • If a profit, enter on both Schedule 1 (Form 1040), line 3 , and on Schedule SE, line 2 . (If you checked the box on line 1, see instructions). Estates and trusts, enter on Form 1041, line 3 . • If a loss, you must go to line 32.	31	18,000,000				
32	If you have a loss, check the box that describes your investment in this activity. See instructions. • If you checked 32a, enter the loss on both Schedule 1 (Form 1040), line 3 , and on Schedule SE, line 2 . (If you checked the box on line 1, see the line 31 instructions). Estates and trusts, enter on Form 1041, line 3 . • If you checked 32b, you must attach Form 6198 . Your loss may be limited.			32a	<input type="checkbox"/> All investment is at risk.		
				32b	<input type="checkbox"/> Some investment is not at risk.		

**SCHEDULE D
(Form 1041)**

Capital Gains and Losses

OMB No. 1545-0092

Department of the Treasury
Internal Revenue Service

- ▶ Attach to Form 1041, Form 5227, or Form 990-T.
- ▶ Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9 and 10.
- ▶ Go to www.irs.gov/F1041 for instructions and the latest information.

2020

Name of estate or trust

RED APPLES TRUST

Employer identification number

00-4000666

Did you 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.

Note: Form 5227 filers need to complete **only** Parts I and II.

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				
1b Totals for all transactions reported on Form(s) 8949 with Box A checked				
2 Totals for all transactions reported on Form(s) 8949 with Box B checked				
3 Totals for all transactions reported on Form(s) 8949 with Box C checked				
4 Short-term capital gain or (loss) from Forms 4684, 6252, 6781, and 8824				4
5 Net short-term gain or (loss) from partnerships, S corporations, and other estates or trusts				5
6 Short-term capital loss carryover. Enter the amount, if any, from line 9 of the 2019 Capital Loss Carryover Worksheet				6 ()
7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column (h). Enter here and on line 17, column (3) on the back				7

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				
8b Totals for all transactions reported on Form(s) 8949 with Box D checked				
9 Totals for all transactions reported on Form(s) 8949 with Box E checked				
10 Totals for all transactions reported on Form(s) 8949 with Box F checked				
11 Long-term capital gain or (loss) from Forms 2439, 4684, 6252, 6781, and 8824				11
12 Net long-term gain or (loss) from partnerships, S corporations, and other estates or trusts				12
13 Capital gain distributions				13
14 Gain from Form 4797, Part I				14 94,000,000
15 Long-term capital loss carryover. Enter the amount, if any, from line 14 of the 2019 Capital Loss Carryover Worksheet				15 ()
16 Net long-term capital gain or (loss). Combine lines 8a through 15 in column (h). Enter here and on line 18a, column (3) on the back				16 94,000,000

Part III Summary of Parts I and II		(1) Beneficiaries' (see instr.)	(2) Estate's or trust's	(3) Total
Caution: Read the instructions before completing this part.				
17	Net short-term gain or (loss)	17		
18	Net long-term gain or (loss):			
a	Total for year	18a	94,000,000	94,000,000
b	Unrecaptured section 1250 gain (see line 18 of the worksheet.)	18b		
c	28% rate gain	18c		
19	Total net gain or (loss). Combine lines 17 and 18a ▶	19	94,000,000	94,000,000

Note: If line 19, column (3), is a net gain, enter the gain on Form 1041, line 4 (or Schedule A (Form 990-T), Part I, line 4a). If lines 18a and 19, column (2), are net gains, go to Part V, and **don't** complete Part IV. If line 19, column (3), is a net loss, complete Part IV and the **Capital Loss Carryover Worksheet**, as necessary.

Part IV Capital Loss Limitation

20	Enter the loss (and enter as a loss) on Form 1041, line 4 (or Schedule A (Form 990-T), Part I, line 4a) if the estate or trust is the smaller of:	
a	The loss on line 19, column (3), or \$3,000	20

Note: If the loss on line 19, column (3), is more than \$3,000, or if Form 1041, page 1, line 23 (or Form 990-T, Part I, line 11), is a loss, complete the **Capital Loss Carryover Worksheet** in the instructions to figure your capital loss carryover.

Part V Tax Computation of Maximum Carryover Gains

Form 1041 filers. Complete this part **only** if both lines 18a and 19 in column (2) are gains, or an amount is entered in Part I or Part II and there is an entry on Form 1041, line 2b(2), and Form 1041, line 23, is more than zero.

Caution: Skip this part and complete the **Schedule D Tax Worksheet** in the instructions if:

- Either line 18b, col. (2) or line 18c, col. (2) is more than zero, or
- Both Form 1041, line 2b(1), and Form 4952, line 4g are more than zero.

Form 990-T trusts. Complete this part **only** if both lines 18a and 19 are gains, or qualified dividends are included in income in Part I of Form 990-T, and Form 990-T, Part I, line 11, is more than zero. Skip this part and complete the **Schedule D Tax Worksheet** in the instructions if either line 18b, col. (2) or line 18c, col. (2) is more than zero.

21	Enter taxable income from Form 1041, line 23 (or Form 990-T, Part I, line 11)	21	93,999,700	
22	Enter the smaller of line 18a or 19 in column (2) but not less than zero	22	94,000,000	
23	Enter the estate's or trust's qualified dividends from Form 1041, line 2b(2) (or enter the qualified dividends included in income in Part I of Form 990-T)	23		
24	Add lines 22 and 23	24	94,000,000	
25	If the estate or trust is filing Form 4952, enter the amount from line 4g; otherwise, enter -0- ▶	25		
26	Subtract line 25 from line 24. If zero or less, enter -0-	26	94,000,000	
27	Subtract line 26 from line 21. If zero or less, enter -0-	27		
28	Enter the smaller of the amount on line 21 or \$2,650	28	2,650	
29	Enter the smaller of the amount on line 27 or line 28	29	0	
30	Subtract line 29 from line 28. If zero or less, enter -0-. This amount is taxed at 0% ▶	30		2,650
31	Enter the smaller of line 21 or line 26	31	93,999,700	
32	Subtract line 30 from line 26	32	93,997,350	
33	Enter the smaller of line 21 or \$13,150	33	13,150	
34	Add lines 27 and 30	34	2,650	
35	Subtract line 34 from line 33. If zero or less, enter -0-	35	10,500	
36	Enter the smaller of line 32 or line 35	36	10,500	
37	Multiply line 36 by 15% (0.15) ▶	37		1,575
38	Enter the amount from line 31	38	93,999,700	
39	Add lines 30 and 36	39	13,150	
40	Subtract line 39 from line 38. If zero or less, enter -0-	40	93,986,550	
41	Multiply line 40 by 20% (0.20) ▶	41		18,797,310
42	Figure the tax on the amount on line 27. Use the 2020 Tax Rate Schedule for Estates and Trusts (see the Schedule G instructions in the instructions for Form 1041)	42		
43	Add lines 37, 41, and 42	43	18,798,885	
44	Figure the tax on the amount on line 21. Use the 2020 Tax Rate Schedule for Estates and Trusts (see the Schedule G instructions in the instructions for Form 1041)	44	34,778,227	
45	Tax on all taxable income. Enter the smaller of line 43 or line 44 here and on Form 1041, Schedule G, Part I, line 1a (or Form 990-T, Part II, line 2) ▶	45		18,798,885

Part III Summary of Parts I and II		(1) Beneficiaries' (see instr.)	(2) Estate's or trust's	(3) Total
Caution: Read the instructions before completing this part.				
17	Net short-term gain or (loss)	17		
18	Net long-term gain or (loss):			
a	Total for year	18a	94,000,000	94,000,000
b	Unrecaptured section 1250 gain (see line 18 of the worksheet.)	18b		
c	28% rate gain	18c		
19	Total net gain or (loss). Combine lines 17 and 18a ▶	19	94,000,000	94,000,000

Note: If line 19, column (3), is a net gain, enter the gain on Form 1041, line 4 (or Schedule A (Form 990-T), Part I, line 4a). If lines 18a and 19, column (2), are net gains, go to Part V, and **don't** complete Part IV. If line 19, column (3), is a net loss, complete Part IV and the **Capital Loss Carryover Worksheet**, as necessary.

Part IV Capital Loss Limitation	
20	Enter the net gain or (loss) on Form 1041, line 4 (or Schedule A (Form 990-T), Part I, line 4a) if the net gain or (loss) is more than zero.
a	The loss on line 19, column (3), or \$3,000 20

Note: If the loss on line 19, column (3), is more than \$3,000, or if Form 1041, page 1, line 23 (or Form 990-T, Part I, line 11), is a loss, complete the **Capital Loss Carryover Worksheet** in the instructions to figure your capital loss carryover.

Part V Tax Computation of Maximum Capital Gains

Form 1041 filers. Complete this part **only** if both lines 18a and 19 in column (2) are gains, or an amount is entered in Part I or Part II and there is an entry on Form 1041, line 2b(2), and Form 1041, line 23, is more than zero.

Caution: Skip this part and complete the **Schedule D Tax Worksheet** in the instructions if:

- Either line 18b, col. (2) or line 18c, col. (2) is more than zero, or
- Both Form 1041, line 2b(1), and Form 4952, line 4g are more than zero.

Form 990-T trusts. Complete this part **only** if both lines 18a and 19 are gains, or qualified dividends are included in income in Part I of Form 990-T, and Form 990-T, Part I, line 11, is more than zero. Skip this part and complete the **Schedule D Tax Worksheet** in the instructions if either line 18b, col. (2) or line 18c, col. (2) is more than zero.

21	Enter taxable income from Form 1041, line 23 (or Form 990-T, Part I, line 11)	21	93,999,700	
22	Enter the smaller of line 18a or 19 in column (2) but not less than zero	22	94,000,000	
23	Enter the estate's or trust's qualified dividends from Form 1041, line 2b(2) (or enter the qualified dividends included in income in Part I of Form 990-T)	23		
24	Add lines 22 and 23	24	94,000,000	
25	If the estate or trust is filing Form 4952, enter the amount from line 4g; otherwise, enter -0- ▶	25		
26	Subtract line 25 from line 24. If zero or less, enter -0-	26	94,000,000	
27	Subtract line 26 from line 21. If zero or less, enter -0-	27		
28	Enter the smaller of the amount on line 21 or \$2,650	28	2,650	
29	Enter the smaller of the amount on line 27 or line 28	29	0	
30	Subtract line 29 from line 28. If zero or less, enter -0-. This amount is taxed at 0% ▶	30		2,650
31	Enter the smaller of line 21 or line 26	31	93,999,700	
32	Subtract line 30 from line 26	32	93,997,350	
33	Enter the smaller of line 21 or \$13,150	33	13,150	
34	Add lines 27 and 30	34	2,650	
35	Subtract line 34 from line 33. If zero or less, enter -0-	35	10,500	
36	Enter the smaller of line 32 or line 35	36	10,500	
37	Multiply line 36 by 15% (0.15) ▶	37		1,575
38	Enter the amount from line 31	38	3,999,700	
39	Add lines 30 and 36	39	13,150	
40	Subtract line 39 from line 38. If zero or less, enter -0-	40	93,986,550	
41	Multiply line 40 by 20% (0.20) ▶	41		18,797,310
42	Figure the tax on the amount on line 27. Use the 2020 Tax Rate Schedule for Estates and Trusts (see the Schedule G instructions in the instructions for Form 1041)	42		
43	Add lines 37, 41, and 42	43	18,798,885	
44	Figure the tax on the amount on line 21. Use the 2020 Tax Rate Schedule for Estates and Trusts (see the Schedule G instructions in the instructions for Form 1041)	44	34,778,227	
45	Tax on all taxable income. Enter the smaller of line 43 or line 44 here and on Form 1041, Schedule G, Part I, line 1a (or Form 990-T, Part II, line 2) ▶	45		18,798,885

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

Department of the Treasury
Internal Revenue Service

▶ Attach to your tax return.

Attachment
Sequence No. **27**

▶ Go to www.irs.gov/Form4797 for instructions and the latest information.

Name(s) shown on return RED APPLES TRUST	Identifying number 00-4000666
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1 Enter the gross proceeds from sales or exchanges of business property for 2020 on Form 999-B or Form 999-C (or substitute statement) that you are including on line 10, or 20. See instructions. **1** **2,750,000**

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 basis	(g) Gain or (loss) Subtract (f) from the result of (d) minus (e)
Bulk		7/22/20	9/1/20	1,000,000	0	770,000	900,000

3 Gain, if any, from Form 4684, line 10 **3**

4 Section 1231 gain from installment sales from Form 6252, line 26 or 27 **4**

5 Section 1231 gain or (loss) from like-kind exchanges from Form 8824 **5**

6 Gain, if any, from line 32, from other than casualty or theft **6**

7 Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows **7** **94,000,000**

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 **8**

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 **9** **94,000,000**

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):

11 Loss, if any, from line 7 **11** ()

12 Gain, if any, from line 7 or amount from line 8, if applicable **12**

13 Gain, if any, from line 31 **13**

14 Net gain or (loss) from Form 4684, lines 31 and 38a **14**

15 Ordinary gain from installment sales from Form 6252, line 25 or 36 **15**

16 Ordinary gain or (loss) from like-kind exchanges from Form 8824 **16**

17 Combine lines 10 through 16 **17**

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**

Part III Gain From Disposition of Property Under Sections 1245, 1250, 1252, 1254, and 1255
(see instructions)

19	(a) Description of section 1245, 1250, 1252, 1254, or 1255 property:	(b) Date acquired (mo., day, yr.)	(c) Date sold (mo., day, yr.)
A			
B			
C			
D			

These columns relate to the properties on lines 19A through 19D. ▶		Property A	Property B	Property C	Property D
20	Gross sales price (Note: See line 1 before completing.)	20			
21	Cost or other basis plus expense of sale	21			
22	Depreciation (or depletion) allowed or allowable.	22			
23	Adjusted basis. Subtract line 22 from line 21.	23			
24	Total gain. Subtract line 23 from line 20	24			
25	If section 1245 property:				
	a Depreciation allowed or allowable from line 22	25a			
	b Enter the smaller of line 24 or 25a.	25b			
26	If section 1250 property: If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.				
	a Additional depreciation after 1975. See instructions	26a			
	b Applicable percentage multiplied by the smaller of line 24 or line 26a. See instructions.	26b			
	c Subtract line 26a from line 24. If residential rental property or line 24 isn't more than line 26a, skip lines 26d and 26e	26c			
	d Additional depreciation after 1969 and before 1976.	26d			
	e Enter the smaller of line 26c or 26d	26e			
	f Section 291 amount (corporations only)	26f			
	g Add lines 26b, 26e, and 26f	26g			
27	If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership.				
	a Soil, water, and land clearing expenses	27a			
	b Line 27a multiplied by applicable percentage. See instructions	27b			
	c Enter the smaller of line 24 or 27b	27c			
28	If section 1254 property:				
	a Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions	28a			
	b Enter the smaller of line 24 or 28a.	28b			
29	If section 1255 property:				
	a Applicable percentage of payments excluded from income under section 126. See instructions	29a			
	b Enter the smaller of line 24 or 29a. See instructions	29b			

Summary of Part III Gains. Complete property columns A through D through line 29b before going to line 30.

30	Total gains for all properties. Add property columns A through D, line 24	30
31	Add property columns A through D, lines 25b, 26g, 27c, 28b, and 29b. Enter here and on line 13	31
32	Subtract line 31 from line 30. Enter the portion from casualty or theft on Form 4684, line 33. Enter the portion from other than casualty or theft on Form 4797, line 6	32

Part IV Recapture Amounts Under Sections 179 and 280F(b)(2) When Business Use Drops to 50% or Less
(see instructions)

	(a) Section 179	(b) Section 280F(b)(2)
33	Section 179 expense deduction or depreciation allowable in prior years.	33
34	Recomputed depreciation. See instructions	34
35	Recapture amount. Subtract line 34 from line 33. See the instructions for where to report	35

Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs)

(Rev. September 2020)

► Go to www.irs.gov/Form8858 for instructions and the latest information.

Department of the Treasury
Internal Revenue Service

Information furnished for the FDE's or FB's annual accounting period (see instructions) beginning January 1, 20 20, and ending December 31, 20 20

Attachment
Sequence No. **140**

Name of person filing this return Red Apples Trust Filer's identifying number

Number, street, and room or suite no. (or P.O. box number if mailing to a post office box street address) 5 Test Street

City or town, state, and ZIP code Lanham, Md. 20706

Filer's tax year beginning _____, 20____, and ending _____, 20____

Important: Fill in all applicable lines and schedules. All information **must** be in English. All amounts **must** be stated in U.S. dollars unless otherwise indicated.

Check here FDE of a U.S. person FDE of a controlled foreign corporation (CFC) FDE of a controlled foreign partnership
 FB of a U.S. person FB of a CFC FB of a controlled foreign partnership

Check here Initial 8858 Final 8858

1a Name and address of FDE or FB Courtland Apples
74 Main Street
Taipa, Macau **b(1)** U.S. identifying number, if any 00-400600
b(2) Reference ID number (see instructions)

c For FDE, country(ies) under whose laws organized and entity type under local tax law CN **d** Date(s) of organization 12/31/2020 **e** Effective date as FDE 12/31/2020

f If benefits under a U.S. tax treaty were claimed with respect to income of the FDE or FB, enter the treaty and article number **g** Country in which principal business activity is conducted **h** Principal business activity **i** Functional currency

2 Provide the following information for the FDE's or FB's accounting period stated above.

a Name, address, and identifying number of branch office or agent (if any) in the United States **b** Name and address (including corporate department, if applicable) of person(s) with custody of the books and records of the FDE or FB, and the location of such books and records, if different

3 For the **tax owner** of the FDE or FB (if different from the filer), provide the following (see instructions):

a Name and address McIntosh Apples
54 Any Street
Grand Bahama F-44735, Bahamas **b** Annual accounting period covered by the return (see instructions)
c(1) U.S. identifying number, if any
c(2) Reference ID number (see instructions) MAB17890
d Country under whose laws organized **e** Functional currency

4 For the **direct owner** of the FDE or FB (if different from the tax owner), provide the following (see instructions):

a Name and address **b** Country under whose laws organized
c U.S. identifying number, if any **d** Functional currency

5 Attach an organizational chart that identifies the name, placement, percentage of ownership, tax classification, and country of organization of all entities in the chain of ownership between the tax owner and the FDE or FB, and the chain of ownership between the FDE or FB and each entity in which the FDE or FB has a 10% or more direct or indirect interest. See instructions.

Schedule C Income Statement (see instructions)

Important: Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules or the average exchange rate determined under section 989(b)). If the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for FDEs or FBs that use DASTM.

If you are using the average exchange rate (determined under section 989(b)), check the following box

	Functional Currency	U.S. Dollar
1	1	
2	2	
3	3	
4	4	
5	5	
6	6	
7	7	
8	8	
9	9	
10	10	
11	11	
12	12	
13	13	
14	14	

Schedule C-1 Section 987 Gain or Loss Information

Note: See the instructions if there are multiple recipients of remittances from the FDE or FB.

	(a) Amount stated in functional currency of FDE or FB	(b) Amount stated in functional currency of recipient	Yes	No
1	1			
2	2			
3	3			
4	Were all remittances from the FDE or FB treated as made to the direct owner?			
5	Did the tax owner change its method of accounting for section 987 gain or loss with respect to remittances from the FDE or FB during the tax year? If "Yes," attach a statement describing the method used prior to the change and new method of accounting.			

Schedule F Balance Sheet

Important: Report all amounts in U.S. dollars computed in functional currency and translated into U.S. dollars in accordance with U.S. GAAP. See instructions for an exception for FDEs or FBs that use DASTM.

Assets		(a) Beginning of annual accounting period	(b) End of annual accounting period
1	Cash and other current assets	1	
2	Other assets	2	
3	Total assets	3	
Liabilities and Owner's Equity			
4	Liabilities	4	
5	Owner's equity	5	
6	Total liabilities and owner's equity	6	

Schedule G Other Information

	Yes	No
1		
2		
3		
4		
5		

Schedule G Other Information (continued)

	Yes	No
6a During the tax year, did the FDE or FB receive, or accrue the receipt of, any amounts defined as a base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) from a foreign person which is a related party of the taxpayer? See instructions. If "Yes," complete lines 6b and 6c		
b Enter the total amount of the base erosion payments \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
7a During the tax year, did the FDE or FB pay, or accrue the payment of, any amounts defined as a base erosion payment under section 59A(d) or have a base erosion tax benefit under section 59A(c)(2) to a foreign person which is a related party of the taxpayer? See instructions. If "Yes," complete lines 7b and 7c		
b Enter the total amount of the base erosion payments \$ _____		
c Enter the total amount of the base erosion tax benefit \$ _____		
8 Is the FDE or FB a qualified business unit as defined in section 989(a)?		
9 Answer the following question only if the taxpayer of the FDE or FB is a CFC: Were there any intracompany transactions between the FDE or FB and the CFC or any other branch of the CFC during the tax year, in which the FDE or FB acted as a manufacturing, selling, or purchasing branch?		
10a Answer the remaining question only if the taxpayer of the FDE or the interest in the FDE is a U.S. corporation. If the FDE or the interest in the FDE is a separate unit under Regulations section 1.1503(d)-1(b)(5)(ii), and is not part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)?		
b If "Yes," enter the amount of the dual consolidated loss. ▶ \$(_____)		
11a If the FB or the interest in the FDE is a separate unit and part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii), does the combined separate unit have a dual consolidated loss as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? If "Yes," complete lines 11b and 11c		
b Enter the amount of the dual consolidated loss for the combined separate unit . . ▶ \$(_____)		
c Enter the net income (loss) attributed to the individual FB or the individual interest in the FDE as determined under Regulations section 1.1503(d)-5(c)(4)(ii)(A) ▶ \$ _____		
12a Was any portion of the dual consolidated loss on line 10b or 11b taken into account in computing U.S. taxable income for the year? If "Yes," go to line 12b. If "No," go to line 13		
b Was this a permitted domestic use of the dual consolidated loss under Regulations section 1.1503(d)-6? If "Yes," see the instructions and go to line 12c. If "No," go to line 12d		
c If "Yes," is the documentation that is required for the permitted domestic use under Regulations section 1.1503(d)-6 attached to the return? After answering this question, go to line 13a		
d If this was not a permitted domestic use, was the dual consolidated loss used to compute consolidated taxable income as provided under Regulations section 1.1503(d)-4? If "Yes," go to line 12e		
e Enter the separate unit's contribution to the cumulative consolidated taxable income ("cumulative register") as of the beginning of the tax year . . ▶ \$ _____ . See instructions.		
13a During the tax year, did any triggering event(s) occur under Regulations section 1.1503(d)-6(e) requiring recapture of any dual consolidated loss(es) attributable to the FB or interest in the FDE, individually or as part of a combined separate unit, in any prior tax years?		
b If "Yes," enter the total amount of recapture ▶ \$ _____ . See instructions.		

Schedule H Current Earnings and Profits or Taxable Income (see instructions)

Important: Enter the amounts on lines 1 through 6 in functional currency.

1	Current year net income (loss) per foreign books of account	1	
2	Total net additions	2	
3	Total net subtractions	3	
4	Current earnings and profits (or taxable income—see instructions) (line 1 plus line 2 minus line 3)	4	
5	DASTM gain (loss) (if applicable)	5	
6	Combine lines 4 and 5	6	
7	Current earnings and profits (or taxable income) in U.S. dollars (line 6 translated at the average exchange rate determined under section 981(b) and the related regulations (see instructions))	7	
8	Enter exchange rate used for line 7 ▶		

Schedule I Transferred Loss Amount (see instructions)

Important: See instructions for who has to complete this section.

		Yes	No
1	Were any assets of an FB (including an FB that is an FDE) transferred to a foreign corporation? If "No," stop here. If "Yes," go to line 2		
2	Was the transferor a domestic corporation that transferred substantially all of the assets of an FB (including an FB that is an FDE) to a specified 100%-owned foreign corporation? If "No," stop here. If "Yes," go to line 3		
3	Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? If "No," stop here. If "Yes," go to line 4		
4	Enter the transferred loss amount included in gross income as required under section 91. See instructions	4	

Schedule J Income Taxes Paid or Accrued (see instructions)

(a) Country or Possession	Foreign Income Taxes			Foreign Tax Credit Separate Categories			
	(b) Foreign Currency	(c) Conversion Rate	(d) U.S. Dollars	(e) Foreign Branch	(f) Passive	(g) General	(h) Other
Totals							

**Net Investment Income Tax—
Individuals, Estates, and Trusts**

Department of the Treasury
Internal Revenue Service (99)

▶ Attach to your tax return.

▶ Go to www.irs.gov/Form8960 for instructions and the latest information.

2020
Attachment
Sequence No. **72**

Name(s) shown on your tax return
Red Apples Trust

Your social security number or EIN
00-4000666

Part I Investment Income Section 6013(g) election (see instructions)
 Section 6013(h) election (see instructions)
 Regulations section 1.1411-10(g) election (see instructions)

1	Taxable interest (see instructions)		1	672,000,000
2	Ordinary dividends (see instructions)		2	40,000,000
3	Annuities (see instructions)		3	
4a	Rental real estate, royalties, partnerships, S corporations, trusts, etc. (see instructions)	4a	4c	
b	Adjustment for net income or loss derived in the ordinary course of a non-section 1411 trade or business (see instructions)	4b		
c	Combine lines 4a and 4b			
5a	Net gain or loss from disposition of property (see instructions)	5a	94,000,000	5d
b	Net gain or loss from disposition of property that is not subject to net investment income tax (see instructions)	5b	-94,000,000	
c	Adjustment from disposition of partnership interest or S corporation stock (see instructions)	5c		
d	Combine lines 5a through 5c			
6	Adjustments to investment income for certain CFCs and PFICs (see instructions)		6	
7	Other modifications to investment income (see instructions)		7	
8	Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7		8	712,000,000

Part II Investment Expenses Allocable to Investment Income and Modifications

9a	Investment interest expenses (see instructions)	9a		9d	0
b	State, local, and foreign income tax (see instructions)	9b			
c	Miscellaneous investment expenses (see instructions)	9c			
d	Add lines 9a, 9b, and 9c				
10	Additional modifications (see instructions)		10		0
11	Total deductions and modifications. Add lines 9d and 10		11		0

Part III Tax Computation

12	Net investment income. Subtract Part II, line 11, from Part I, line 8. Individuals, complete lines 13–17. Estates and trusts, complete lines 18a–21. If zero or less, enter -0-		12	712,000,000	
Individuals:					
13	Modified adjusted gross income (see instructions)	13		16	0
14	Threshold based on filing status (see instructions)	14			
15	Subtract line 14 from line 13. If zero or less, enter -0-	15			
16	Enter the smaller of line 12 or line 15				
17	Net investment income tax for individuals. Multiply line 16 by 3.8% (0.038). Enter here and include on your tax return (see instructions)		17		0
Estates and Trusts:					
18a	Net investment income (line 12 above)	18a	712,000,000	18c	0
b	Deductions for distributions of net investment income and deductions under section 642(c) (see instructions)	18b	728,320,000		
c	Undistributed net investment income. Subtract line 18b from 18a (see instructions). If zero or less, enter -0-				
19a	Adjusted gross income (see instructions)	19a	93,999,950	19c	0
b	Highest tax bracket for estates and trusts for the year (see instructions)	19b	12,950		
c	Subtract line 19b from line 19a. If zero or less, enter -0-		93,987,000		
20	Enter the smaller of line 18c or line 19c			20	0
21	Net investment income tax for estates and trusts. Multiply line 20 by 3.8% (0.038). Enter here and include on your tax return (see instructions)			21	0

Part II Additional Information *(continued)*

**DRAFT AS OF
August 27, 2020
DO NOT FILE**

**SCHEDULE A
(Form 8975)**

(Rev. December 2020)

Department of the Treasury
Internal Revenue Service

Tax Jurisdiction and Constituent Entity Information

For reporting period beginning 01/01, 2020, and ending 12/31, 2020

OMB No. 1545-2272

▶ A separate Schedule A (Form 8975) is to be completed for each tax jurisdiction of the multinational enterprise group.
▶ Go to www.irs.gov/Form8975 for instructions and the latest information.

Name of the reporting entity

Red Apples Trust

EIN

00-4000666

Part I Tax Jurisdiction Information. All financial amounts must be stated in U.S. dollars. See instructions.

Tax jurisdiction

MX

1. Revenues		3. Income tax paid (on cash basis)	4. Income tax accrued—current year	5. Stated capital	6. Accumulated earnings	7. Number of employees	8. Tangible assets other than cash and cash equivalents
(a) Unrelated party	(b) Related party						
23,974,000	836,000	7,443,000	1,674,675	6,202,500	2,170,875	31	22,329,000

Part II Constituent Entity Information

1. Constituent entities resident in the tax jurisdiction	2. Entity role	3. TIN	4. Tax jurisdiction of organization or incorporation if different from tax jurisdiction of residence	5. Main business activities	
				(a) Activity code	(b) If you entered the code for "Other," describe the business activity.
Manzana Roja		MRJ120417R24		CBC506 CBC511	
Empire Apples		AEP031212F8P		CBC506 CBC511	
Braeburn Apples		URA1116049Q1		CBC506 CBC511	

Form **8453-FE**

**U.S. Estate or Trust Declaration
for an IRS e-file Return**

OMB No. 1545-0967

For calendar year 2020, or fiscal year beginning 01/01, 2020, and ending 12/31, 20 20

2020

Department of the Treasury
Internal Revenue Service

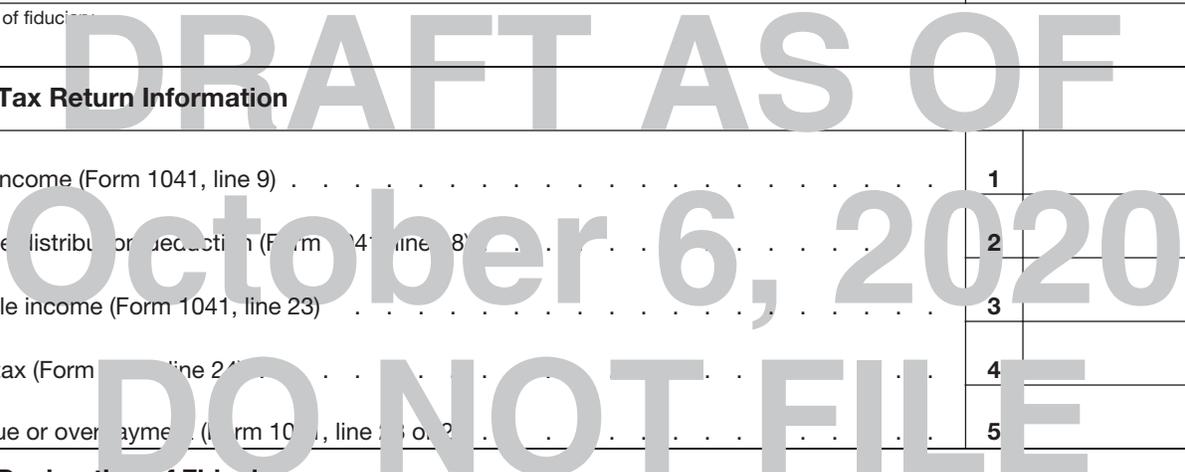
▶ **File electronically with the estate's or trust's return. Do not file paper copies.**
▶ **Go to www.irs.gov/Form8453FE for the latest information.**

Name of estate or trust

RED APPLES TRUST

Employer identification number

Name and title of fiduciary



Part I Tax Return Information

1	Total income (Form 1041, line 9)	1	824,000,000
2	Income distribution deduction (Form 1041, line 8)	2	728,320,000
3	Taxable income (Form 1041, line 23)	3	93,999,700
4	Total tax (Form 1041, line 24)	4	18,798,945
5	Tax due or overpayment (Form 1041, line 25)	5	18,798,945

Part II Declaration of Fiduciary

6 I authorize the U.S. Treasury and its designated Financial Agent to initiate an ACH electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the estate's or trust's taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at **1-888-353-4537** no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment.

Under penalties of perjury, I declare that the above amounts (or the amounts on the attached listing) agree with the amounts shown on the corresponding lines of the electronic portion of the 2020 U.S. Income Tax Return(s) for Estates and Trusts. I have also examined a copy of the return(s) being filed electronically with the IRS, and all accompanying schedules and statements. To the best of my knowledge and belief, they are true, correct, and complete. If I am not the transmitter, I consent that the return(s), including this declaration and accompanying schedules and statements, be sent to the IRS by the return transmitter. I also consent to the IRS's sending the ERO and/or transmitter an acknowledgement of receipt of transmission and an indication of whether or not the return(s) is accepted, and, if rejected, the reason(s) for the rejection.

Sign Here

Signature of fiduciary or officer representing fiduciary

Date

Part III Declaration of Electronic Return Originator (ERO) and Paid Preparer (see instructions)

I declare that I have reviewed the above estate or trust return(s) and that the entries on Form 8453-FE are complete and correct to the best of my knowledge. If I am only a collector, I am not responsible for reviewing the return(s), and only declare that this form accurately reflects the data on the return(s). The fiduciary or an officer representing the fiduciary will have signed this form before I submit the return(s). I will give the fiduciary or officer representing the fiduciary a copy of all forms and information to be filed with the IRS, and have followed all other requirements described in Pub. 4164, Modernized e-File (MeF) Guide for Software Developers and Transmitters. If I am also the Paid Preparer, under penalties of perjury I declare that I have examined the above estate or trust return(s) and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer is based on all information of which the preparer has any knowledge.

ERO's Use Only	ERO's signature	Date	Check if also paid preparer <input type="checkbox"/>	Check if self-employed <input type="checkbox"/>	ERO's SSN or PTIN
	Firm's name (or yours if self-employed), address, and ZIP code	EIN	Phone no.		

Under penalties of perjury, I declare that I have examined the above estate or trust return(s) and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer is based on all information of which the preparer has any knowledge.

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check if self-employed <input type="checkbox"/>	PTIN
	Firm's name	Firm's EIN			
	Firm's address	Phone no.			

Schedule K-1 (Form 1041)

2020

Department of the Treasury Internal Revenue Service

For calendar year 2020, or tax year

beginning 1 / 1 / 2020 ending 12 / 31 / 2020

Beneficiary's Share of Income, Deductions, Credits, etc. See back of form and instructions.

Part I Information about the estate or trust

A Estate's or trust's employer identification number 00-4000666

B Estate's or trust's name RED APPLES TRUST

C Fiduciary's name, address, city, state, and ZIP code

Kim Apples, CPA 5 Test Street Lanham, Md. 20706

D Check if Form 1041-T was filed and enter the date it was filed

E Check if this is the final Form 1041 for the estate or trust

Part II Information About the Beneficiary

F Beneficiary's identifying number 213-08-8715

G Beneficiary's name, address, city, state, and ZIP code Green Red Kiwi 6th Test Street Lanham, Md. 20706

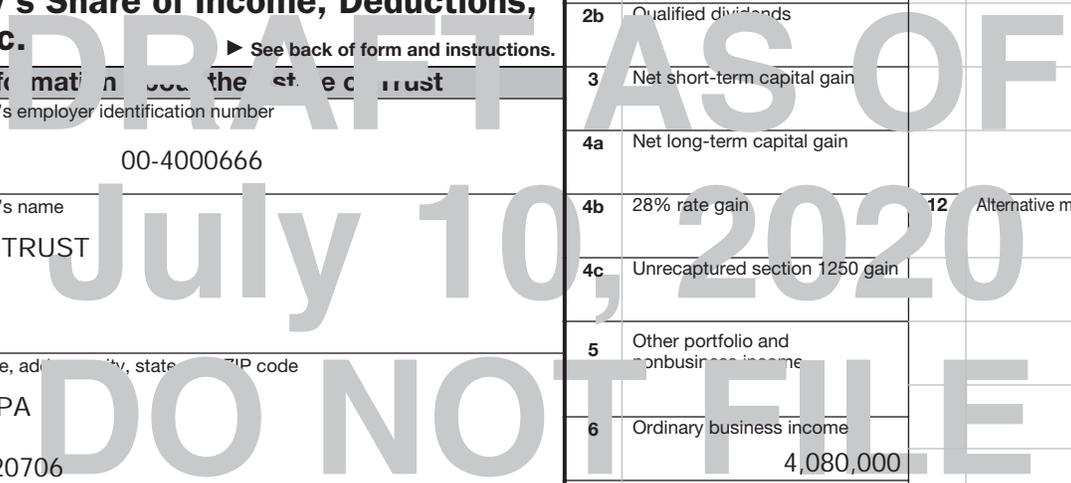
H Domestic beneficiary Foreign beneficiary

Part III Beneficiary's Share of Current Year Income, Deductions, Credits, and Other Items

Table with 14 rows and 2 columns. Rows include: 1 Interest income (168,000,000), 2a Ordinary dividends (10,000,000), 2b Qualified dividends, 3 Net short-term capital gain, 4a Net long-term capital gain, 4b 28% rate gain, 4c Unrecaptured section 1250 gain, 5 Other portfolio and nonbusiness income, 6 Ordinary business income (4,080,000), 7 Net rental real estate income, 8 Other rental income, 9 Directly apportioned deductions, 10 Estate tax deduction, 11 Final year deductions, 12 Alternative minimum tax adjustment, 13 Credits and credit recapture, 14 Other information.

*See attached statement for additional information. Note: A statement must be attached showing the beneficiary's share of income and directly apportioned deductions from each business, rental real estate, and other rental activity.

For IRS Use Only



Schedule K-1 (Form 1041)

2020

Department of the Treasury Internal Revenue Service

For calendar year 2020, or tax year

beginning 1 / 1 / 2020 ending 12 / 31 / 2020

Beneficiary's Share of Income, Deductions, Credits, etc. See back of form and instructions.

Part I Information about the estate or trust

A Estate's or trust's employer identification number 00-4000666

B Estate's or trust's name RED APPLES TRUST

C Fiduciary's name, address, city, state, and ZIP code

Kim Apples, CPA 5 Test Street Lanham, Md. 20706

D Check if Form 1041-T was filed and enter the date it was filed

E Check if this is the final Form 1041 for the estate or trust

Part II Information About the Beneficiary

F Beneficiary's identifying number 213-08-8713

G Beneficiary's name, address, city, state, and ZIP code Fushia Red Lime 6th Test Street Lanham, Md. 20706

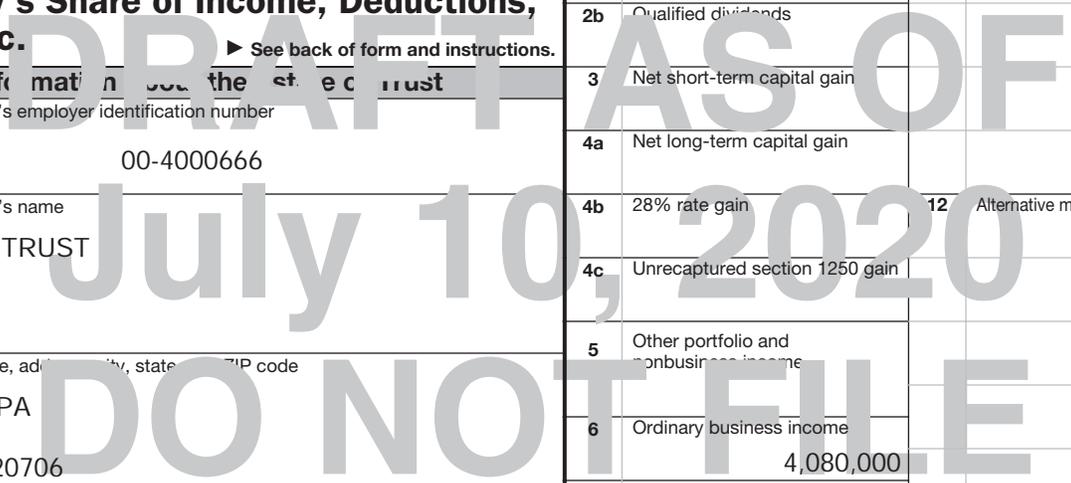
H Domestic beneficiary Foreign beneficiary

Part III Beneficiary's Share of Current Year Income, Deductions, Credits, and Other Items

Table with 4 columns: Line number, Description, Amount, and Other information. Includes rows for Interest income (168,000,000), Dividends (10,000,000), Business income (4,080,000), and various deductions and credits.

*See attached statement for additional information. Note: A statement must be attached showing the beneficiary's share of income and directly apportioned deductions from each business, rental real estate, and other rental activity.

For IRS Use Only



Schedule K-1 (Form 1041)

2020

Department of the Treasury Internal Revenue Service

For calendar year 2020, or tax year

beginning 1 / 1 / 2020 ending 12 / 31 / 2020

Beneficiary's Share of Income, Deductions, Credits, etc. See back of form and instructions.

Part I Information about the estate or trust

A Estate's or trust's employer identification number 00-4000666

B Estate's or trust's name RED APPLES TRUST

C Fiduciary's name, address, city, state, and ZIP code Kim Apples, CPA 5 Test Street Lanham, Md. 20706

D Check if Form 1041-T was filed and enter the date it was filed

E Check if this is the final Form 1041 for the estate or trust

Part II Information About the Beneficiary

F Beneficiary's identifying number 213-08-8714

G Beneficiary's name, address, city, state, and ZIP code Blue Red Coconut 6th Test Street Lanham, Md. 20706

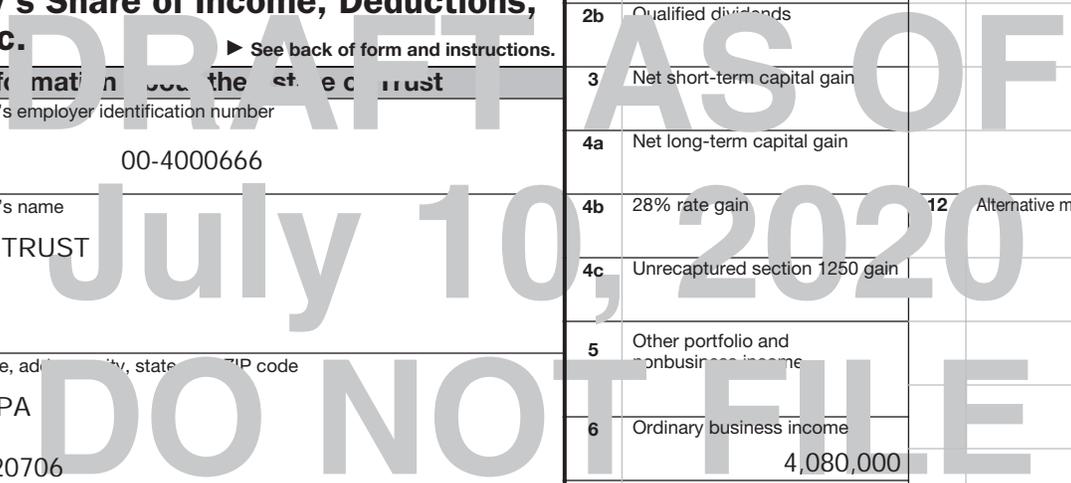
H Domestic beneficiary Foreign beneficiary

Part III Beneficiary's Share of Current Year Income, Deductions, Credits, and Other Items

Table with 14 rows and 4 columns: Line number, Description, Amount, and Other information. Includes entries for Interest income (168,000,000), Dividends (10,000,000), Business income (4,080,000), and Estate tax deduction (125,000).

For IRS Use Only

*See attached statement for additional information. Note: A statement must be attached showing the beneficiary's share of income and directly apportioned deductions from each business, rental real estate, and other rental activity.



Schedule K-1 (Form 1041)

2020

Department of the Treasury Internal Revenue Service

For calendar year 2020, or tax year

beginning 1 / 1 / 2020 ending 12 / 31 / 2020

Beneficiary's Share of Income, Deductions, Credits, etc. See back of form and instructions.

Part I Information about the estate or trust

A Estate's or trust's employer identification number 00-4000666

B Estate's or trust's name RED APPLES TRUST

C Fiduciary's name, address, city, state, and ZIP code

Kim Apples, CPA 5 Test Street Lanham, Md. 20706

D Check if Form 1041-T was filed and enter the date it was filed

E Check if this is the final Form 1041 for the estate or trust

Part II Information About the Beneficiary

F Beneficiary's identifying number 213-08-8715

G Beneficiary's name, address, city, state, and ZIP code Green Red Kiwi 6th Test Street Lanham, Md. 20706

H Domestic beneficiary Foreign beneficiary

Part III Beneficiary's Share of Current Year Income, Deductions, Credits, and Other Items

Table with 14 rows and 2 columns. Rows include: 1 Interest income (168,000,000), 2a Ordinary dividends (10,000,000), 2b Qualified dividends, 3 Net short-term capital gain, 4a Net long-term capital gain, 4b 28% rate gain, 4c Unrecaptured section 1250 gain, 5 Other portfolio and nonbusiness income, 6 Ordinary business income (4,080,000), 7 Net rental real estate income, 8 Other rental income, 9 Directly apportioned deductions, 10 Estate tax deduction, 11 Final year deductions, 12 Alternative minimum tax adjustment, 13 Credits and credit recapture, 14 Other information.

*See attached statement for additional information. Note: A statement must be attached showing the beneficiary's share of income and directly apportioned deductions from each business, rental real estate, and other rental activity.

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