

September 14, 2018

1040 Individual ATS Scenario 17

Taxpayer: Tim Spring

TIN: 400-00-1099

Forms Included in the Scenario:

- Form 1040
- 1040 Schedule 1
- Form 1040 Schedule B
- Form 1040 Schedule D
- Form 1116
- Form 8949
- Form 965
- Form 965-A
- Form 965 Schedule A
- Form 965 Schedule B
- Form 965 Schedule C
- Form 965 Schedule D
- Form 965 Schedule E
- Form 965 Schedule F
- Form 965 Schedule G
- Form 965 Schedule H

Return Summary:

- Test for 965 forms and schedules

ForeignTaxCrCarrybackComputationStatement (Carryback or carryover, Form 1116, Part 3, Line 10)

Explanation
2013 From Tax Paid 37 Carryover 37 2012 From Tax Paid 26 Carryover 26

ForeignTaxWithheldOnDividendsStatement (Dividends, Form 1116, Part 2, Line A, Column (k))

Explanation
Other Countries Date Paid 20181231

Filing status: Single Married filing jointly Married filing separately Head of household Qualifying widow(er)

Your first name and initial: **Tim** Last name: **Spring** Your social security number: **4 0 0 0 0 1 0 9 9**

Your standard deduction: Someone can claim you as a dependent You were born before January 2, 1954 You are blind

If joint return, spouse's first name and initial: Last name: Spouse's social security number:

Spouse standard deduction: Someone can claim your spouse as a dependent Spouse was born before January 2, 1954 Full-year health care coverage or exempt (see inst.) Spouse is blind Spouse itemizes on a separate return or you were dual-status alien

Home address (number and street). If you have a P.O. box, see instructions. **10065 Victor St** Apt. no. Presidential Election Campaign (see inst.) You Spouse

City, town or post office, state, and ZIP code. If you have a foreign address, attach Schedule 6. **Cincinnati, OH 45219** If more than four dependents, see inst. and here

Dependents (see instructions):

(1) First name	Last name	(2) Social security number	(3) Relationship to you	(4) <input checked="" type="checkbox"/> if qualifies for (see inst.):	
				Child tax credit	Credit for other dependents
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>

Sign Here Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Joint return? See instructions. Keep a copy for your records. Your signature: **Tim Spring** Date: **03/15/2018** Your occupation: **Retired** If the IRS sent you an Identity Protection PIN, enter it here (see inst.): Spouse's signature. If a joint return, both must sign. Date: Spouse's occupation: If the IRS sent you an Identity Protection PIN, enter it here (see inst.):

Paid Preparer Use Only Preparer's name: **Waters End** Preparer's signature: **Waters End** PTIN: **P00000007** Firm's EIN: Check if: 3rd Party Designee Self-employed Firm's name: **Ocean Inc** Phone no.: **888-555-1212** Firm's address: **100 Efile Drive, Anytown, NY 10006**

Attach Form(s) W-2. Also attach Form(s) W-2G and 1099-R if tax was withheld.

Standard Deduction for —

- Single or married filing separately, \$12,000
- Married filing jointly or Qualifying widow(er), \$24,000
- Head of household, \$18,000
- If you checked any box under Standard deduction, see instructions.

1	Wages, salaries, tips, etc. Attach Form(s) W-2	1	
2a	Tax-exempt interest	2a	1,041
3a	Qualified dividends	3a	3,999
4a	IRAs, pensions, and annuities	4a	
5a	Social security benefits	5a	16,776
b	Taxable interest	2b	13
b	Ordinary dividends	3b	5,652
b	Taxable amount	4b	
b	Taxable amount	5b	1,132
6	Total income. Add lines 1 through 5. Add any amount from Schedule 1, line 22	6	18,966
7	Adjusted gross income. If you have no adjustments to income, enter the amount from line 6; otherwise, subtract Schedule 1, line 36, from line 6	7	18,966
8	Standard deduction or itemized deductions (from Schedule A)	8	12,000
9	Qualified business income deduction (see instructions)	9	
10	Taxable income. Subtract lines 8 and 9 from line 7. If zero or less, enter -0-	10	6,966
11	a Tax (see inst) (check if any from: 1 <input type="checkbox"/> Form(s) 8814 2 <input type="checkbox"/> Form 4972 3 <input type="checkbox"/>)	11	0
	b Add any amount from Schedule 2 and check here <input type="checkbox"/>	12	
12	a Child tax credit/credit for other dependents b Add any amount from Schedule 3 and check here <input type="checkbox"/>	12	
13	Subtract line 12 from line 11. If zero or less, enter -0-	13	0
14	Other taxes. Attach Schedule 4	14	
15	Total tax. Add lines 13 and 14	15	0
16	Federal income tax withheld from Forms W-2 and 1099	16	
17	Refundable credits: a EIC (see inst.) b Sch 8812 c Form 8863	17	
	Add any amount from Schedule 5	18	0
18	Add lines 16 and 17. These are your total payments	18	
19	If line 18 is more than line 15, subtract line 15 from line 18. This is the amount you overpaid	19	
20a	Amount of line 19 you want refunded to you . If Form 8888 is attached, check here <input type="checkbox"/>	20a	
b	Routing number c Type: <input type="checkbox"/> Checking <input type="checkbox"/> Savings		
d	Account number		
21	Amount of line 19 you want applied to your 2019 estimated tax	21	
22	Amount you owe . Subtract line 18 from line 15. For details on how to pay, see instructions	22	0
23	Estimated tax penalty (see instructions)	23	

Refund

Direct deposit? See instructions.

SCHEDULE 1
(Form 1040)

Additional Income and Adjustments to Income

OMB No. 1545-0074

2018
Attachment
Sequence No. **01**

Department of the Treasury
Internal Revenue Service

▶ **Attach to Form 1040.**

▶ **Go to www.irs.gov/Form1040 for instructions and the latest information.**

Name(s) shown on Form 1040

Tim Spring

Your social security number

400-00-1099

Additional Income	1-9b	Reserved		1-9b	
	10	Taxable refunds, credits, or offsets of state and local income taxes		10	
	11	Alimony received		11	
	12	Business income or (loss). Attach Schedule C or C-EZ		12	
	13	Capital gain or (loss). Attach Schedule D if required. If not required, check here <input type="checkbox"/>		13	12,169
	14	Other gains or (losses). Attach Form 4797		14	
	15a	Reserved		15b	
	16a	Reserved		16b	
	17	Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E		17	
	18	Farm income or (loss). Attach Schedule F		18	
	19	Unemployment compensation		19	
	20a	Reserved		20b	
	21	Other income. List type and amount ▶	21		
	22	Combine the amounts in the far right column. If you don't have any adjustments to income, enter here and include on Form 1040, line 6. Otherwise, go to line 23	22	12,169	
Adjustments to Income	23	Educator expenses	23		
	24	Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106	24		
	25	Health savings account deduction. Attach Form 8889	25		
	26	Moving expenses for members of the Armed Forces. Attach Form 3903	26		
	27	Deductible part of self-employment tax. Attach Schedule SE	27		
	28	Self-employed SEP, SIMPLE, and qualified plans	28		
	29	Self-employed health insurance deduction	29		
	30	Penalty on early withdrawal of savings	30		
	31a	Alimony paid b Recipient's SSN ▶	31a		
	32	IRA deduction	32		
	33	Student loan interest deduction	33		
	34	Reserved	34		
35	Reserved	35			
	36	Add lines 23 through 35	36		

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

Cat. No. 71479F

Schedule 1 (Form 1040) 2018

SCHEDULE B
(Form 1040)

Interest and Ordinary Dividends

OMB No. 1545-0074

2018
Attachment
Sequence No. **08**

Department of the Treasury
Internal Revenue Service (99)

► Go to www.irs.gov/ScheduleB for instructions and the latest information.
► Attach to Form 1040.

Name(s) shown on return
Tim Spring

Your social security number
400-00-1099

Part I
Interest

(See instructions and the instructions for Form 1040, line 2b.)

Note: If you received a Form 1099-INT, Form 1099-OID, or substitute statement from a brokerage firm, list the firm's name as the payer and enter the total interest shown on that form.

1 List name of payer. If any interest is from a seller-financed mortgage and the buyer used the property as a personal residence, see the instructions and list this interest first. Also, show that buyer's social security number and address ►

Saving Bank
Stock Company

Amount

12
1

2 Add the amounts on line 1 **2** 13
3 Excludable interest on series EE and I U.S. savings bonds issued after 1989. Attach Form 8815 **3**
4 Subtract line 3 from line 2. Enter the result here and on Form 1040, line 2b . . ► **4** 13

Note: If line 4 is over \$1,500, you must complete Part III.

Part II
Ordinary Dividends

(See instructions and the instructions for Form 1040, line 3b.)

Note: If you received a Form 1099-DIV or substitute statement from a brokerage firm, list the firm's name as the payer and enter the ordinary dividends shown on that form.

5 List name of payer ► Stock Company

Amount

5,652

6 Add the amounts on line 5. Enter the total here and on Form 1040, line 3b . . ► **6** 5,652

Note: If line 6 is over \$1,500, you must complete Part III.

Part III

You must complete this part if you **(a)** had over \$1,500 of taxable interest or ordinary dividends; **(b)** had a foreign account; or **(c)** received a distribution from, or were a grantor of, or a transferor to, a foreign trust.

Foreign Accounts and Trusts

(See instructions.)

7a At any time during 2018, did you have a financial interest in or signature authority over a financial account (such as a bank account, securities account, or brokerage account) located in a foreign country? See instructions

Yes	No
	✓

If "Yes," are you required to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR), to report that financial interest or signature authority? See FinCEN Form 114 and its instructions for filing requirements and exceptions to those requirements

b If you are required to file FinCEN Form 114, enter the name of the foreign country where the financial account is located ►

8 During 2018, did you receive a distribution from, or were you the grantor of, or transferor to, a foreign trust? If "Yes," you may have to file Form 3520. See instructions

	✓
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**SCHEDULE D
(Form 1040)**

Capital Gains and Losses

OMB No. 1545-0074

2018

Attachment
Sequence No. **12**

Department of the Treasury
Internal Revenue Service (99)

▶ **Attach to Form 1040 or Form 1040NR.**
▶ **Go to www.irs.gov/ScheduleD for instructions and the latest information.**
▶ **Use Form 8949 to list your transactions for lines 1b, 2, 3, 8b, 9, and 10.**

Name(s) shown on return

Tim Spring

Your social security number

400-00-1099

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 gain from Form 6252 and short-term gain or (loss) from Forms 4684, 6781, and 8824				4
5 Net short-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1				5
6 Short-term capital loss carryover. Enter the amount, if any, from line 8 of your Capital Loss Carryover Worksheet in the instructions				6 ()
7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column (h). If you have any long-term capital gains or losses, go to Part II below. Otherwise, go to Part III 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	18,000	17,217		783
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 Gain from Form 4797, Part I; long-term gain from Forms 2439 and 6252; and long-term gain or (loss) from Forms 4684, 6781, and 8824				11
12 Net long-term gain or (loss) from partnerships, S corporations, estates, and trusts from Schedule(s) K-1				12
13 Capital gain distributions. See the instructions				13 11,386
14 Long-term capital loss carryover. Enter the amount, if any, from line 13 of your Capital Loss Carryover Worksheet in the instructions				14 ()
15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column (h). Then go to Part III on the back				15 12,169

Part III Summary

16 Combine lines 7 and 15 and enter the result **16** 12,169

- If line 16 is a **gain**, enter the amount from line 16 on Schedule 1 (Form 1040), line 13, or Form 1040NR, line 14. Then go to line 17 below.
- If line 16 is a **loss**, skip lines 17 through 20 below. Then go to line 21. Also be sure to complete line 22.
- If line 16 is **zero**, skip lines 17 through 21 below and enter -0- on Schedule 1 (Form 1040), line 13, or Form 1040NR, line 14. Then go to line 22.

17 Are lines 15 and 16 **both** gains?
 Yes. Go to line 18.
 No. Skip lines 18 through 21, and go to line 22.

18 If you are required to complete the **28% Rate Gain Worksheet** (see instructions), enter the amount, if any, from line 7 of that worksheet **18**

19 If you are required to complete the **Unrecaptured Section 1250 Gain Worksheet** (see instructions), enter the amount, if any, from line 18 of that worksheet **19**

20 Are lines 18 and 19 **both** zero or blank?
 Yes. Complete the **Qualified Dividends and Capital Gain Tax Worksheet** in the instructions for Form 1040, line 11a (or in the instructions for Form 1040NR, line 42). **Don't** complete lines 21 and 22 below.
 No. Complete the **Schedule D Tax Worksheet** in the instructions. **Don't** complete lines 21 and 22 below.

21 If line 16 is a loss, enter here and on Schedule 1 (Form 1040), line 13, or Form 1040NR, line 14, the **smaller** of:
 • The loss on line 16; or
 • (\$3,000), or if married filing separately, (\$1,500) } **21** ()

Note: When figuring which amount is smaller, treat both amounts as positive numbers.

22 Do you have qualified dividends on Form 1040, line 3a, or Form 1040NR, line 10b?
 Yes. Complete the **Qualified Dividends and Capital Gain Tax Worksheet** in the instructions for Form 1040, line 11a (or in the instructions for Form 1040NR, line 42).
 No. Complete the rest of Form 1040 or Form 1040NR.

Foreign Tax Credit

(Individual, Estate, or Trust)

▶ Attach to Form 1040, 1040NR, 1041, or 990-T.

▶ Go to www.irs.gov/Form1116 for instructions and the latest information.

Name: Tim Spring Identifying number as shown on page 1 of your tax return: 400-00-1099

Use a separate Form 1116 for each category of income listed below. See *Categories of Income* in the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a Section 951A income
 c Passive category income
 e Section 901(j) income
 g Lump-sum distributions
 b Foreign branch income
 d General category income
 f Certain income re-sourced by treaty

h Resident of (name of country) ▶ US

Note: If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

Part I Taxable Income or Loss From Sources Outside the United States (for category checked above)

i	Enter the name of the foreign country or U.S. possession ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
		A	B	C	
	<u>OC</u>				
1a	Gross income from sources within country shown above and of the type checked above (see instructions):				
		<u>5,652</u>			1a <u>5,652</u>
b	Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) ▶ <input type="checkbox"/>				
Deductions and losses (Caution: See instructions.):					
2	Expenses definitely related to the income on line 1a (attach statement)				
3	Pro rata share of other deductions not definitely related:				
a	Certain itemized deductions or standard deduction (see instructions)	<u>7,900</u>			
b	Other deductions (attach statement)				
c	Add lines 3a and 3b	<u>7,900</u>			
d	Gross foreign source income (see instructions)	<u>5,652</u>			
e	Gross income from all sources (see instructions)	<u>18,966</u>			
f	Divide line 3d by line 3e (see instructions)	<u>0.29801</u>			
g	Multiply line 3c by line 3f	<u>2,354</u>			
4	Pro rata share of interest expense (see instructions):				
a	Home mortgage interest (use the Worksheet for Home Mortgage Interest in the instructions)				
b	Other interest expense				
5	Losses from foreign sources				
6	Add lines 2, 3g, 4a, 4b, and 5	<u>2,354</u>			6 <u>2,354</u>
7	Subtract line 6 from line 1a. Enter the result here and on line 15, page 2 ▶				7 <u>3,298</u>

Part II Foreign Taxes Paid or Accrued (see instructions)

Country	Credit is claimed for taxes (you must check one) (j) <input checked="" type="checkbox"/> Paid (k) <input type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:			(p) Other foreign taxes paid or accrued	Taxes withheld at source on:			(t) Other foreign taxes paid or accrued	(u) Total foreign taxes paid or accrued (add cols. (q) through (t))
		(l) Date paid or accrued	(m) Dividends	(n) Rents and royalties		(o) Interest	(q) Dividends	(r) Rents and royalties		
A	<u>12/31/2018</u>	<u>45</u>				<u>45</u>			<u>45</u>	
B										
C										
8	Add lines A through C, column (u). Enter the total here and on line 9, page 2 ▶								8 <u>45</u>	

Part III Figuring the Credit

9	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I	9	45	
10	Carryback or carryover (attach detailed computation) (If your income was section 951A income (box a above Part I), leave line 10 blank.)	10	63	
11	Add lines 9 and 10	11	108	
12	Reduction in foreign taxes (see instructions)	12	()	
13	Taxes reclassified under high tax kickout (see instructions)	13		
14	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit	14		108
15	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see instructions)	15	3,298	
16	Adjustments to line 15 (see instructions)	16		
17	Combine the amounts on lines 15 and 16. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 18 through 22. However, if you are filing more than one Form 1116, you must complete line 20.)	17	3,298	
18	Individuals: Enter the amount from Form 1040, line 10; or Form 1040NR, line 41. Estates and trusts: Enter your taxable income without the deduction for your exemption	18	6,966	
	Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.			
19	Divide line 17 by line 18. If line 17 is more than line 18, enter "1"	19		0.04722
20	Individuals: Enter the total of Form 1040, line 11a, and Schedule 2 (Form 1040), line 46. If you are a nonresident alien, enter the total of Form 1040NR, lines 42 and 44. Estates and trusts: Enter the amount from Form 1041, Schedule G, line 1a; or the total of Form 990-T, lines 40, 41, and 43. Foreign estates and trusts should enter the amount from Form 1040NR, line 42	20		
	Caution: If you are completing line 20 for separate category g (lump-sum distributions), see instructions.			
21	Multiply line 20 by line 19 (maximum amount of credit)	21		
22	Enter the smaller of line 14 or line 21. If this is the only Form 1116 you are filing, skip lines 23 through 30 and enter this amount on line 31. Otherwise, complete the appropriate line in Part IV (see instructions) ▶	22		0

Part IV Summary of Credits From Separate Parts III (see instructions)

23	Credit for taxes on section 951A income	23		
24	Credit for taxes on foreign branch income	24		
25	Credit for taxes on passive category income	25		
26	Credit for taxes on general category income	26		
27	Credit for taxes on section 901(j) income	27		
28	Credit for taxes on certain income re-sourced by treaty	28		
29	Credit for taxes on lump-sum distributions	29		
30	Add lines 23 through 29	30		
31	Enter the smaller of line 20 or line 30	31		
32	Reduction of credit for international boycott operations. See instructions for line 12	32		
33	Subtract line 32 from line 31. This is your foreign tax credit . Enter here and on Schedule 3 (Form 1040), line 48; Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 45a . ▶	33		

Foreign Tax Credit

Department of the Treasury
Internal Revenue Service (99)

(Individual, Estate, or Trust)

▶ Attach to Form 1040, 1040NR, 1041, or 990-T.

▶ Go to www.irs.gov/Form1116 for instructions and the latest information.

2018
Attachment
Sequence No. **19**

Name Tim Spring Identifying number as shown on page 1 of your tax return 400-00-1099

Use a separate Form 1116 for each category of income listed below. See *Categories of Income* in the instructions. Check only one box on each Form 1116. Report all amounts in U.S. dollars except where specified in Part II below.

- a Section 951A income
- b Foreign branch income
- c Passive category income
- d General category income
- e Section 901(j) income
- f Certain income re-sourced by treaty
- g Lump-sum distributions

h Resident of (name of country) ▶ US

Note: If you paid taxes to only one foreign country or U.S. possession, use column A in Part I and line A in Part II. If you paid taxes to more than one foreign country or U.S. possession, use a separate column and line for each country or possession.

Part I Taxable Income or Loss From Sources Outside the United States (for category checked above)

i	Enter the name of the foreign country or U.S. possession ▶	Foreign Country or U.S. Possession			Total (Add cols. A, B, and C.)
		A	B	C	
	<u>OC</u>		<u>AO</u>		
1a	Gross income from sources within country shown above and of the type checked above (see instructions): ----- -----				
		<u>5,652</u>			1a <u>5,775</u>
b	Check if line 1a is compensation for personal services as an employee, your total compensation from all sources is \$250,000 or more, and you used an alternative basis to determine its source (see instructions) . . . ▶ <input type="checkbox"/>				
Deductions and losses (Caution: See instructions.):					
2	Expenses definitely related to the income on line 1a (attach statement)				
3	Pro rata share of other deductions not definitely related:				
a	Certain itemized deductions or standard deduction (see instructions)				
b	Other deductions (attach statement)				
c	Add lines 3a and 3b				
d	Gross foreign source income (see instructions)	<u>5,652</u>	<u>28</u>		
e	Gross income from all sources (see instructions)	<u>18,966</u>	<u>18,966</u>		
f	Divide line 3d by line 3e (see instructions)	<u>0.29665</u>	<u>0.00147</u>		
g	Multiply line 3c by line 3f	<u>2,354</u>	<u>0</u>		
4	Pro rata share of interest expense (see instructions):				
a	Home mortgage interest (use the Worksheet for Home Mortgage Interest in the instructions)				
b	Other interest expense				
5	Losses from foreign sources				
6	Add lines 2, 3g, 4a, 4b, and 5	<u>2,354</u>	<u>0</u>		6 <u>2,354</u>
7	Subtract line 6 from line 1a. Enter the result here and on line 15, page 2 ▶				7 <u>3,298</u>

Part II Foreign Taxes Paid or Accrued (see instructions)

Country	Credit is claimed for taxes (you must check one) (j) <input checked="" type="checkbox"/> Paid (k) <input type="checkbox"/> Accrued	Foreign taxes paid or accrued								
		In foreign currency				In U.S. dollars				
		Taxes withheld at source on:			(p) Other foreign taxes paid or accrued	Taxes withheld at source on:			(t) Other foreign taxes paid or accrued	(u) Total foreign taxes paid or accrued (add cols. (q) through (t))
		(l) Date paid or accrued	(m) Dividends	(n) Rents and royalties		(o) Interest	(q) Dividends	(r) Rents and royalties		
A	<u>12/31/2018</u>	<u>45</u>				<u>45</u>				<u>45</u>
B										
C										
8	Add lines A through C, column (u). Enter the total here and on line 9, page 2 ▶									8 <u>45</u>

Part III Figuring the Credit

9	Enter the amount from line 8. These are your total foreign taxes paid or accrued for the category of income checked above Part I	9	45	
10	Carryback or carryover (attach detailed computation) (If your income was section 951A income (box a above Part I), leave line 10 blank.)	10	63	
11	Add lines 9 and 10	11	108	
12	Reduction in foreign taxes (see instructions)	12	()	
13	Taxes reclassified under high tax kickout (see instructions)	13		
14	Combine lines 11, 12, and 13. This is the total amount of foreign taxes available for credit	14		108
15	Enter the amount from line 7. This is your taxable income or (loss) from sources outside the United States (before adjustments) for the category of income checked above Part I (see instructions)	15	5,652	
16	Adjustments to line 15 (see instructions)	16		
17	Combine the amounts on lines 15 and 16. This is your net foreign source taxable income. (If the result is zero or less, you have no foreign tax credit for the category of income you checked above Part I. Skip lines 18 through 22. However, if you are filing more than one Form 1116, you must complete line 20.)	17	5,652	
18	Individuals: Enter the amount from Form 1040, line 10; or Form 1040NR, line 41. Estates and trusts: Enter your taxable income without the deduction for your exemption	18	6,966	
	Caution: If you figured your tax using the lower rates on qualified dividends or capital gains, see instructions.			
19	Divide line 17 by line 18. If line 17 is more than line 18, enter "1"	19		0.81136
20	Individuals: Enter the total of Form 1040, line 11a, and Schedule 2 (Form 1040), line 46. If you are a nonresident alien, enter the total of Form 1040NR, lines 42 and 44. Estates and trusts: Enter the amount from Form 1041, Schedule G, line 1a; or the total of Form 990-T, lines 40, 41, and 43. Foreign estates and trusts should enter the amount from Form 1040NR, line 42	20		
	Caution: If you are completing line 20 for separate category g (lump-sum distributions), see instructions.			
21	Multiply line 20 by line 19 (maximum amount of credit)	21		
22	Enter the smaller of line 14 or line 21. If this is the only Form 1116 you are filing, skip lines 23 through 30 and enter this amount on line 31. Otherwise, complete the appropriate line in Part IV (see instructions) ▶	22		0

Part IV Summary of Credits From Separate Parts III (see instructions)

23	Credit for taxes on section 951A income	23		
24	Credit for taxes on foreign branch income	24		
25	Credit for taxes on passive category income	25		
26	Credit for taxes on general category income	26		
27	Credit for taxes on section 901(j) income	27		
28	Credit for taxes on certain income re-sourced by treaty	28		
29	Credit for taxes on lump-sum distributions	29		
30	Add lines 23 through 29	30		
31	Enter the smaller of line 20 or line 30	31		
32	Reduction of credit for international boycott operations. See instructions for line 12	32		
33	Subtract line 32 from line 31. This is your foreign tax credit . Enter here and on Schedule 3 (Form 1040), line 48; Form 1040NR, line 46; Form 1041, Schedule G, line 2a; or Form 990-T, line 45a . ▶	33		

Inclusion of Deferred Foreign Income Upon Transition to Participation Exemption System

▶ Attach to tax return.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

For calendar year 20 18 , or other tax year beginning 1-31 , 20 18 and ending 12-31 , 20 18 of the filer.

Name of person filing this return Tim Spring	Identifying number 400-00-1099
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Note. Throughout this form, the term “2018 tax year” refers to 2018 calendar tax years and fiscal tax years of the person filing this return that begin in 2018. The term “2017 tax year” refers to 2017 calendar tax years and fiscal tax years of the person filing this return that begin in 2017.

Part I Section 965(a) Inclusion	
1 2018 tax year section 965(a) inclusion amounts from Schedule A. Enter the sum of column (k) of Schedule A	1 105
2 2018 tax year section 965(a) inclusions from pass-throughs. Attach schedule	2
3 Total 2018 tax year section 965(a) inclusion. Add lines 1 and 2. Enter on Form 1120, Schedule C, line 15, column (a); Form 1040, line 21; or the corresponding line of other applicable tax return ▶	3 105
4 2017 tax year section 965(a) inclusion amounts from Schedule A. Enter the sum of column (j) of Schedule A	4 35
5 2017 tax year section 965(a) inclusions from pass-throughs. Attach schedule	5
6 Total 2017 tax year section 965(a) inclusion. Add lines 4 and 5 ▶	6 35

Part II Section 965(c) Deduction	
SECTION 1—Section 965(c) Deduction by Tax Year	2018 Tax Year
7 Enter the amount from Part I, line 1. If -0-, skip to line 16	7 105
8 Aggregate Foreign Cash Position. Enter the sum from Schedule D, line 21	8 205
9 Enter the smaller of line 7 or 8	9 105
10 Enter the 2018 15.5% Rate Equivalent Percentage from Part II, Section 2. Enter amount from Section 2, line 1a	10 0.261904762
11 Section 965(c) Deduction Related to 15.5% Rate Equivalent Percentage. Multiply line 9 by line 10	11 28
12 Subtract line 9 from line 7	12
13 Enter the 2018 8% Rate Equivalent Percentage from Part II, Section 2. Enter amount from Section 2, line 1b	13 0.619047619
14 Section 965(c) Deduction Related to 8% Rate Equivalent Percentage. Multiply line 12 by line 13	14
15 2018 tax year section 965(c) deduction not from pass-throughs. Add lines 11 and 14	15 28
16 2018 tax year section 965(c) deduction from pass-throughs. Attach schedule	16
17 Total 2018 tax year section 965(c) deduction. Add lines 15 and 16	17 28

SECTION 1—Section 965(c) Deduction by Tax Year *(continued)*

2017 Tax Year

18	Enter the amount from Part I, line 4. If -0-, skip to line 27	18	35
19	Aggregate Foreign Cash Position. Enter the sum from Schedule D, line 19	19	240
20	Enter the smaller of line 18 or 19	20	35
21	Enter the 2017 15.5% Rate Equivalent Percentage from Part II, Section 2. For calendar year persons, enter amount from Section 2, line 1a. For fiscal year persons, enter amount from Section 2, line 2c	21	.557142857
22	Section 965(c) Deduction Related to 15.5% Rate Equivalent Percentage. Multiply line 20 by line 21	22	20
23	Subtract line 20 from line 18	23	
24	Enter the 2017 8% Rate Equivalent Percentage from Part II, Section 2. For calendar year persons, enter amount from Section 2, line 1b. For fiscal year persons, enter amount from Section 2, line 2e	24	.771428571
25	Section 965(c) Deduction Related to 8% Rate Equivalent Percentage. Multiply line 23 by line 24	25	
26	2017 tax year section 965(c) deductions not from pass-throughs. Add lines 22 and 25	26	20
27	2017 tax year section 965(c) deductions from pass-throughs. Attach schedule	27	
28	Total 2017 tax year section 965(c) deductions. Add lines 26 and 27	28	20

SECTION 2—Rate Equivalent Percentages

1	Calendar Year Persons	2017 Calendar Year	2018 Calendar Year
a	15.5 Percent Rate Equivalent Percentage	0.557142857	0.261904762
b	8 Percent Rate Equivalent Percentage	0.771428571	0.619047619
2	Fiscal Year Persons		
a	Enter the section 15 blended rate calculated in accordance with section 965(c)(2) (see instructions) 15.5 Percent Rate Equivalent Percentage	2a	
b	Subtract 15.5% from line 2a	2b	
c	Divide line 2b by line 2a	2c	
	8 Percent Rate Equivalent Percentage		
d	Subtract 8% from line 2a	2d	
e	Divide line 2d by line 2a	2e	

Part III Elections

	Yes	No
A Was an election made to pay the net tax liability over 8 years as provided for in section 965(h)?		✓
B Complete if a shareholder in an S corporation. Was an election made to defer payment of net tax liability as provided for in section 965(i)?		
C Complete if a Real Estate Investment Trust. Was an election made to include income over 8 years as provided for in section 965(m)?		
D Was an election made not to apply a net operating loss deduction as provided in section 965(n)?		
E Was the election provided for in Regulations section 1.965-2(f)(2) made?		

Individual Report of Net 965 Tax Liability

OMB No. 1545-0074

▶ Go to www.irs.gov/Form965A for instructions and the latest information.

Check this box if this is an amended report

Name of taxpayer with a net 965 tax liability <i>Tim Spring</i>	Identifying number <i>400-00-1099</i>	Taxable year of reporting <i>2018</i>
--	--	--

Part I Report of Net 965 Tax Liability and Election To Pay in Installments

	(a) Year of Section 965(a) Inclusion, Liability Assumed, or Liability Triggering Event (see instructions)	(b) Taxpayer's Net Tax Liability with all 965 amounts (see instructions)	(c) Taxpayer's Net Tax Liability without 965 amounts (see instructions)	(d) Net 965 Tax Liability (subtract column (c) from column (b))	(e) S Corporation Shareholder Total Deferred Net 965 Tax Liability (line total from Part III, column (g), see instructions)
1	2017				
2	2018	6,966	6,966	0	
3					
4					
5					
6					
7					

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	(f) Net 965 Tax Liability eligible for installment payment election (subtract column (e) from column (d), see instructions)	(g) Installment Election Made		(h) Net 965 Tax Liability to be paid in full for Year 1 (if column (g) is "No," enter amount from column (f))	(i) Net 965 Tax Liability to be paid in installments (if column (g) is "Yes," enter amount from column (f) and see instructions)	(j) Net 965 Tax Liability Transferred (Out), Transferred In, or Subsequent Adjustments, if any (see instructions)	(k) Tax Identification Number of buyer/transferee or seller/transferor
		Yes	No				
1							
2							
3							
4							
5							
6							
7							

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Part II Record of Amount of Net 965 Tax Liability Paid by the Taxpayer (see instructions)

	(a) Year of Section 965(a) Inclusion, Liability Assumption, or Triggering Event	(b) Paid for Year 1	(c) Paid for Year 2	(d) Paid for Year 3	(e) Paid for Year 4	(f) Paid for Year 5
1	2017					
2	2018		0			
3						
4						
5						
6						
7						

Part II Record of Amount of Net 965 Tax Liability Paid by the Taxpayer (continued)					
	(g) Paid for Year 6	(h) Paid for Year 7	(i) Paid for Year 8	(j) Net 965 Tax Liability Remaining Unpaid (see instructions)	(k) Net 965 Tax Liability Paid for the Reporting Year
1					
2					
3					
4					
5					
6					
7					
Totals					

Part III S Corporation Shareholder: Report of Calculation of Net 965 Tax Liability Related to 965 Amounts Allocated From an S Corporation and Election To Defer Such Net 965 Tax Liability

Year of 965(a) Inclusion	(a) S Corporation Name	(b) S Corporation Tax Identification Number	(c) Taxpayer's Net Tax Liability with only 965 amounts from this S Corporation (see instructions)	(d) Taxpayer's Net Tax Liability without 965 amounts (see instructions)	(e) Net 965 Tax Liability related to 965 amounts from this S Corporation (subtract column (d) from column (c))	(f) Deferral Election Made		(g) Deferred Net 965 Tax Liability (if column (f) is "Yes," enter amount from column (e))
						Yes	No	
1 2017	(i)							
	(ii)							
	(iii)							
	(iv)							
	(v)							
Total								
2 2018	(i)							
	(ii)							
	(iii)							
	(iv)							
	(v)							
Total								

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Part IV Annual Report of Deferred Net 965 Tax Liability Related to 965 Amounts Allocated From S Corporations

(required every year until the liability is fully paid)

	(a) Election or Transfer Year	(b) S Corporation Name	(c) S Corporation Tax Identification Number	(d) Beginning Deferred Net 965 Tax Liability (see instructions)
1				
2				
3				
4				
5				
6				
7				
8				
9				
10				

	(e) Reserved for Future Use	(f) Net 965 Tax Liability Triggered (see instructions)	(g) Deferred 965 Net Tax Liability Transferred (Out) or Transferred In by Agreement, if any (see instructions)	(h) Tax Identification Number of Transferee or Transferor	(i) Deferred Net Tax Liability at the end of this Reporting Year (add columns (d), (e), (f), and (g)) (see instructions)
1		()			
2		()			
3		()			
4		()			
5		()			
6		()			
7		()			
8		()			
9		()			
10		()			

Total ▶

If more lines are needed for any Part on this form, attach additional sheets.

**SCHEDULE A
(Form 965)**

U.S. Shareholder's Section 965(a) Inclusion Amount

(January 2019)

▶ **Attach to Form 965.**

OMB No. 1545-0123

Department of the Treasury
Internal Revenue Service

▶ **Go to www.irs.gov/Form965 for instructions and the latest information.**

Name of person filing this return

Identifying number

Tim Spring

400-00-1099

	(a) Name of Deferred Foreign Income Corporation (DFIC)	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b) U.S. Tax Year End (Year/Month) of DFIC (see instructions)	(c) Accumulated Post-1986 Deferred Foreign Income in Functional Currency (see instructions)	(d) December 31, 2017 Spot Rate	(e) Accumulated Post-1986 Deferred Foreign Income in U.S. Dollars (divide column (c) by column (d))
1	Company 3	00-0000014	12/2017	50	0.5000	100
2	Company 4	AZ981256	12/2018	75	0.2500	300
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16	Total (lines 1-15)					

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	(f) U.S. Shareholder's Pro Rata Share of Column (e)	(g) Deficit Allocation Ratio (column (f) amount divided by column (f), line 16)	(h) U.S. Shareholder's Aggregate Foreign E&P Deficit (see instructions)	(i) Section 965(a) Inclusion Amount (column (f) less column (h))	(j) Section 965(a) Inclusion Amount Taken Into Account in the 2017 Tax Year	(k) Section 965(a) Inclusion Amount Taken Into Account in the 2018 Tax Year
1	100	0.2500	65	35	35	
2	300	0.7500	195	105		105
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16	400		260	140	35	105

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Add schedules as needed.

**SCHEDULE B
(Form 965)**

Deferred Foreign Income Corporation's Earnings and Profits (E&P)

▶ Attach to Form 965.

- ▶ Go to www.irs.gov/Form965 for instructions and the latest information.
- ▶ Complete for Deferred Foreign Income Corporations.
- ▶ List E&P Deficit Foreign Corporations in Schedule C.

OMB No. 1545-0123

(January 2019)

Department of the Treasury
Internal Revenue Service

Name of person filing this return

Tim Spring

Identifying number

400-00-1099

a Separate Category (Enter code—see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶

	Name of Deferred Foreign Income Corporation	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b)(1) November 2, 2017 Post-1986 E&P in Functional Currency	(b)(2) Check box if Alternative Method for Calculating E&P Elected (see instructions)	(c) November 2, 2017 Post-1986 Previously Taxed E&P in Functional Currency (see instructions)	(d) November 2, 2017 Post-1986 E&P Attributable to ECI in Functional Currency
1	Company 3	00-0000014	50		0	0
2	Company 4	AZ981256	75		0	0
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						

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	(e) November 2, 2017 Accumulated Post-1986 Deferred Foreign Income in Functional Currency (column (b)(1) less columns (c) and (d))	(f) December 31, 2017 Post-1986 E&P in Functional Currency	(g) December 31, 2017 Post-1986 Previously Taxed E&P in Functional Currency (see instructions)	(h) December 31, 2017 Post-1986 E&P Attributable to ECI in Functional Currency	(i) December 31, 2017 Accumulated Post-1986 Deferred Foreign Income in Functional Currency (column (f) less columns (g) and (h))
1	50	50	0	0	50
2	75	75	0	0	75
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					

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Add schedules as needed.

**SCHEDULE C
(Form 965)**

(January 2019)

Department of the Treasury
Internal Revenue Service

U.S. Shareholder's Aggregate Foreign Earnings and Profits Deficit

▶ Attach to Form 965.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

▶ If a Specified Foreign Corporation is included on Schedule B, it should not be included on this Schedule C.

▶ List E&P Deficit Foreign Corporations in this Schedule C.

OMB No. 1545-0123

Name of person filing this return

Tim Spring

Identifying number

400-00-1099

a Separate Category (Enter code—see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶

	(a) Name of E&P Deficit Foreign Corporation	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b) November 2, 2017 Post-1986 E&P Deficit in Functional Currency	(c) December 31, 2017 Spot Rate (see instructions)	(d) November 2, 2017 Post-1986 E&P Deficit in U.S. Dollars (divide column (b) by column (c))	(e) U.S. Shareholder's Pro Rata Share of Column (d)
1	Company 1	00-0000012	100	.9999	100	100
2	Company 2	00-0000013	120	0.7500	160	160
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16	Total (lines 1–15)					260

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Add schedules as needed.

**SCHEDULE D
(Form 965)**

(January 2019)
Department of the Treasury
Internal Revenue Service

U.S. Shareholder's Aggregate Foreign Cash Position

▶ Attach to Form 965.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing this return

Tim Spring

Identifying number

400-00-1099

Enter amounts in U.S. Dollars.

	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b) Cash Position at Close of the Last Taxable Year Prior to the Year Referenced in Column (d) (enter amount from Schedule E, column (b)(3))	(c) Pro Rata Share of Column (b)	(d) Cash Position at Close of the Last Taxable Year That Ends Before November 2, 2017 (enter amount from Schedule E, column (c)(3))	(e) Pro Rata Share of Column (d)	(f) Cash Position at Close of the Last Taxable Year Beginning Before January 1, 2018 (enter amount from Schedule E, column (d)(3))	(g) Pro Rata Share of Column (f)
1	Company 1 00-000012	60	60	50	50	60	60
2	Company 2 00-000013	60	60	50	50	60	60
3	Company 3 00-000014	60	60	50	50	60	60
4	Company 4 AZ981256	60	60	50	50	60	60
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16	Total (lines 1-15)			240	200		240

Add schedules as needed.

17 Enter the total of column (g) ▶	17	<u>240</u>
18 Combine totals of columns (c) and (e) and divide by two ▶	18	<u>220</u>
19 Aggregate Foreign Cash Position. Enter the larger of the amount on line 17 or the amount on line 18 ▶	19	<u>240</u>
20 Aggregate Foreign Cash Position Taken Into Account on the 2017 Tax Return ▶	20	<u>35</u>
21 Aggregate Foreign Cash Position Taken Into Account on the 2018 Tax Return ▶	21	<u>205</u>

Schedule D (Form 965) (1-2019)

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**SCHEDULE E
(Form 965)**

U.S. Shareholder's Aggregate Foreign Cash Position — Detail

(January 2019)

▶ **Attach to Form 965.**

OMB No. 1545-0123

Department of the Treasury
Internal Revenue Service

▶ **Go to www.irs.gov/Form965 for instructions and the latest information.**

Name of person filing this return

Identifying number

[Tim Spring](#)

400-00-1099

Enter amounts in U.S. Dollars.

	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b)(1) Cash Position at Close of the Last Taxable Year Prior to the Year Referenced in Column (c)(3) Other Than Derivative Financial Instruments and Hedging Transactions	(b)(2) Cash Position at Close of the Last Taxable Year Prior to the Year Referenced in Column (c)(3) From Derivative Financial Instruments and Hedging Transactions	(b)(3) Cash Position at Close of the Last Taxable Year Prior to the Year Referenced in Column (c)(3) (add columns (b)(1) and (b)(2))
1	Company 1 00-0000012	60		60
2	Company 2 00-0000013	60		60
3	Company 3 00-0000014	60		60
4	Company 4 AZ981256	60		60
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
16	Total (lines 1–15)		240	240

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	(c)(1) Cash Position at Close of the Last Taxable Year That Ends Before November 2, 2017 Other Than Derivative Financial Instruments and Hedging Transactions	(c)(2) Cash Position at Close of the Last Taxable Year That Ends Before November 2, 2017 From Derivative Financial Instruments and Hedging Transactions	(c)(3) Cash Position at Close of the Last Taxable Year That Ends Before November 2, 2017 (add columns (c)(1) and (c)(2))	(d)(1) Cash Position at Close of the Last Taxable Year Beginning Before January 1, 2018 Other Than Derivative Financial Instruments and Hedging Transactions	(d)(2) Cash Position at Close of the Last Taxable Year Beginning Before January 1, 2018 From Derivative Financial Instruments and Hedging Transactions	(d)(3) Cash Position at Close of the Last Taxable Year Beginning Before January 1, 2018 (add columns (d)(1) and (d)(2))
1	50		50	60		60
2	50		50	60		60
3	50		50	60		60
4	50		50	60		60
5	INTERNAL USE ONLY					
6	DRAFT AS OF					
7	August 30, 2018					
8						
9						
10						
11						
12						
13						
14						
15						
16	200		200	240		240

Add schedules as needed.

**SCHEDULE F
(Form 965)**

(January 2019)

Department of the Treasury
Internal Revenue Service

Foreign Taxes Deemed Paid by Domestic Corporation
For tax years of foreign corporations whose last taxable year beginning before January 1, 2018, ends during the U.S. shareholder's 2018 tax year

▶ Attach to Form 965.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing this return

Tim Spring

Identifying number

400-00-1099

a Separate Category (Enter code—see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶

	(a) Name of Deferred Foreign Income Corporation (DFIC)	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b) EIN or Reference ID Number of K-1 Issuer (if any) (see instructions)	(c) U.S. Tax Year End (Year/Month) of DFIC	(d) Country of Incorporation (use country codes) (see instructions)	(e)(1) Section 965(a) Inclusion in U.S. Dollars	(e)(2) Section 965(a) Inclusion in Functional Currency
1	Company 4	AZ981256		12/2018	AO	105	26
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16	Total not from pass-throughs (sum of lines 1–15) (see instructions)					105	
17	Total from pass-throughs (sum of lines 1–15) (see instructions)					0	

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	(f) Post-1986 Undistributed Earnings in Functional Currency	(g) Divide Column (e)(2) by Column (f) (capped at 100%)	(h) Opening Balance in Post-1986 Foreign Income Taxes	(i) Foreign Taxes Paid for Tax Year Indicated	(j) Foreign Taxes Deemed Paid for Tax Year Indicated	(k) Post-1986 Foreign Income Taxes (add columns (h), (i), and (j))	(l) Taxes Deemed Paid (multiply column (g) by column (k))
1	75	35.00%	10			10	4
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							4
17							0

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Add schedules as needed.

**SCHEDULE G
(Form 965)**

(January 2019)

Department of the Treasury
Internal Revenue Service

Foreign Taxes Deemed Paid by Domestic Corporation
For tax years of foreign corporations whose last taxable year beginning before January 1, 2018, ends during the
U.S. shareholder's 2017 tax year

▶ Attach to Form 965.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing this return

Tim Spring

Identifying number

400-00-1099

a Separate Category (Enter code—see instructions.) ▶

GEN

b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶

	(a) Name of Deferred Foreign Income Corporation (DFIC)	(a) EIN or Reference ID Number of the Foreign Corporation (see instructions)	(b) EIN or Reference ID Number of K-1 Issuer (if any) (see instructions)	(c) U.S. Tax Year End (Year/Month) of DFIC	(d) Country of Incorporation (use country codes) (see instructions)	(e)(1) Section 965(a) Inclusion in U.S. Dollars	(e)(2) Section 965(a) Inclusion in Functional Currency
1	Company 3	00-000014		12/2017	AY	35	18
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16	Total not from pass-throughs (sum of lines 1–15) (see instructions)					35	
17	Total from pass-throughs (sum of lines 1–15) (see instructions)					0	

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	(f) Post-1986 Undistributed Earnings in Functional Currency	(g) Divide Column (e)(2) by Column (f) (capped at 100%)	(h) Opening Balance in Post-1986 Foreign Income Taxes	(i) Foreign Taxes Paid for Tax Year Indicated	(j) Foreign Taxes Deemed Paid for Tax Year Indicated	(k) Post-1986 Foreign Income Taxes (add columns (h), (i), and (j))	(l) Taxes Deemed Paid (multiply column (g) by column (k))
1	50	35.00%	10			10	4
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							4
17							0

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DRAFT AS OF
August 30, 2018

Add schedules as needed.

**SCHEDULE H
(Form 965)**

(January 2019)

Department of the Treasury
Internal Revenue Service

**Amounts Reported on Forms 1116 and 1118
and Disallowed Foreign Taxes**

▶ Attach to Form 965.

▶ Go to www.irs.gov/Form965 for instructions and the latest information.

OMB No. 1545-0123

Name of person filing this return

Tim Spring

Identifying number

400-00-1099

SECTION 1—Amounts Reported on Forms 1116 and 1118 and Disallowed Foreign Taxes

- a Separate Category (Enter code—see instructions.) ▶ GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) ▶

		2018 Tax Year	
1	Section 965(a) inclusion amount in U.S. Dollars from Schedule F, column (e)(1), line 16	1	105
2	Section 965(a) inclusion in U.S. Dollars with respect to pass-throughs from Schedule F, column (e)(1), line 17	2	0
3	Total 965(a) inclusion in U.S. Dollars. Add lines 1 and 2. Report amount here and on Form 1116, Part I, or 1118, Sch. A (see instructions) ▶	3	105
4	Section 965(c) deduction in U.S. Dollars not from pass-throughs allocable to section 965(a) inclusion amount (see instructions)	4	28
5	Section 965(c) deduction in U.S. Dollars from pass-throughs allocable to section 965(a) inclusion (see instructions)	5	0
6	Total section 965(c) deduction in U.S. Dollars. Add lines 4 and 5. Report amount here and on Form 1116, Part I, or Form 1118, Sch. A ▶	6	28
7	Taxes deemed paid not from pass-throughs. Enter amount from Schedule F, column (I), line 16	7	4
8	Taxes deemed paid through pass-throughs. Enter amount from Schedule F, column (I), line 17	8	0
9	Taxes deemed paid. Add lines 7 and 8. Report amount here and on Form 1118, Part I, Sch. B, column 3	9	4
10	2018 Applicable Percentage not from pass-throughs. Enter amount from Schedule H, line 37	10	55.7000
11	2018 Applicable Percentage from pass-throughs. If there are multiple pass-throughs, leave this line blank and attach a schedule	11	
12	Disallowed foreign taxes not from pass-throughs. Multiply line 7 by line 10	12	2
13	Disallowed foreign taxes through pass-throughs. Attach calculation. See instructions	13	
14	Disallowed foreign taxes. Add lines 12 and 13. Report amount here and on Form 1118, Schedule G, Part I, line F	14	2
		2017 Tax Year	
15	Section 965(a) inclusion amount in U.S. Dollars from Schedule G, column (e)(1), line 16	15	35
16	Section 965(a) inclusion in U.S. Dollars from pass-throughs from Schedule G, column (e)(1), line 17	16	
17	Total 965(a) inclusion in U.S. Dollars. Add lines 15 and 16	17	35
18	Section 965(c) deduction in U.S. Dollars not from pass-throughs allocable to section 965(a) inclusion amount (see instructions)	18	20
19	Section 965(c) deduction in U.S. Dollars from pass-throughs allocable to section 965(a) inclusion (see instructions)	19	
20	Total section 965(c) deduction in U.S. Dollars. Add lines 18 and 19	20	20
21	Taxes deemed paid not from pass-throughs. Enter amount from Schedule G, column (I), line 16	21	4
22	Taxes deemed paid through pass-throughs. Enter amount from Schedule G, column (I), line 17	22	
23	Taxes deemed paid. Add lines 21 and 22	23	4
24	2017 Applicable Percentage. Enter amount from Schedule H, line 46	24	55.7000
25	2017 Applicable Percentage from pass-throughs. If there are multiple pass-throughs, leave this line blank and attach a schedule	25	
26	Disallowed foreign taxes not from pass-throughs. Multiply line 21 by line 24	26	2
27	Disallowed foreign taxes from pass-throughs. Attach calculation (see instructions)	27	
28	Disallowed foreign taxes. Add lines 26 and 27	28	2

SECTION 2—Applicable Percentage for Disallowance of Foreign Tax Credit Not From Pass-Throughs

2018 Tax Year Applicable Percentage		2018 Tax Year
29	Portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 12	29 0
30	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12	30 105
31	Divide line 29 by line 30	31 0.0000000
32	Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 31 by 0.771	32 0
33	Portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 9	33 105
34	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 9 and 12	34 105
35	Divide line 33 by line 34	35 1
36	Applicable percentage with respect to the portion of the aggregate 2018 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 35 by 0.557	36 55.7000
37	2018 Applicable Percentage. Add lines 32 and 36	37 55.7000
2017 Tax Year Applicable Percentage		2017 Tax Year
38	Portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 23	38 0
39	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 20 and 23	39 35
40	Divide line 38 by line 39	40 0.0000000
41	Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount not corresponding to the aggregate foreign cash position. Multiply line 40 by 0.771	41 .00
42	Portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Enter amount from Form 965, Part II, section 1, line 20	42 35
43	Total section 965(a) inclusion amount. Enter the sum of Form 965, Part II, section 1, lines 20 and 23	43 35
44	Divide line 42 by line 43	44 1.0000000
45	Applicable percentage with respect to the portion of the aggregate 2017 tax year section 965(a) inclusion amount corresponding to the aggregate foreign cash position. Multiply line 44 by 0.557	45 55.7000
46	2017 Applicable Percentage. Add lines 41 and 45	46 55.7000