

Final K-3

Amended K-3

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

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

OMB No. 1545-0123

2021

Department of the Treasury
Internal Revenue Service

For calendar year 2021, or tax year beginning ____ / ____ / 2021, ending ____ / ____ / ____

▶ See separate instructions.

Information About the Partnership

Information About the Partner

A Partnership's employer identification number

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

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

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

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Part I Partner's Share of Current Year International Transaction Information

Additional specified attachments:

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

Part II Foreign Tax Credit Limitation

Section 1—Gross Income

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code _____)		
1 Sales							
A _____							
B _____							
C _____							
2 Gross income from performance of services							
A _____							
B _____							
C _____							
3 Gross rental real estate income							
A _____							
B _____							
C _____							
4 Other gross rental income							
A _____							
B _____							
C _____							
5 Guaranteed payments							
6 Interest income							
A _____							
B _____							
C _____							
7 Ordinary dividends (exclude amount on line 8)							
A _____							
B _____							
C _____							
8 Qualified dividends							
A _____							
B _____							
C _____							

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Part II Foreign Tax Credit Limitation (continued)

Section 1—Gross Income (continued)

Description	(a) U.S. source	Foreign Source			(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income		
9 Reserved						
10 Royalties and license fees						
A _____						
B _____						
C _____						
11 Net short-term capital gain						
A _____						
B _____						
C _____						
12 Net long-term capital gain						
A _____						
B _____						
C _____						
13 Collectibles (28%) gain						
A _____						
B _____						
C _____						
14 Unrecaptured section 1250 gain						
A _____						
B _____						
C _____						
15 Net section 1231 gain						
A _____						
B _____						
C _____						
16 Section 986(c) gain						
17 Section 987 gain						
18 Section 988 gain						
19 Section 951(a) inclusions						
A _____						
B _____						
C _____						

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Part II Foreign Tax Credit Limitation (continued)

Section 1—Gross Income (continued)

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other category code _____		
20 Other income							
A _____							
B _____							
C _____							
21 Reserved							
A _____							
B _____							
C _____							
22 Reserved							
A _____							
B _____							
C _____							
23 Reserved							
A _____							
B _____							
C _____							
24 Total gross income (combine lines 1 through 23) ▶							
A _____							
B _____							
C _____							

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Section 2—Deductions

25 Expenses allocable to sales income							
26 Expenses allocable to gross income from performances of services							
27 Net short-term capital loss							
28 Net long-term capital loss							
29 Collectibles loss							
30 Net section 1231 loss							
31 Other losses							
32 Research & experimental (R&E) expenses							
A SIC code							
B SIC code							
C SIC code							

Part II Foreign Tax Credit Limitation *(continued)*

Section 2—Deductions *(continued)*

Description	(a) U.S. source	Foreign Source				(f) Sourced by partner	(g) Total
		(b) Foreign branch category income	(c) Passive category income	(d) General category income	(e) Other (category code ____)		
33 Allocable rental expenses—depreciation, depletion, and amortization							
34 Allocable rental expenses—other than depreciation, depletion, and amortization							
35 Allocable royalty and licensing expenses—depreciation, depletion, and amortization							
36 Allocable royalty and licensing expenses—other than depreciation, depletion, and amortization							
37 Depreciation not included on line 33 or 35							
38 Charitable contributions							
39 Interest expense specifically allocable under Regulations section 1.861-10(e) .							
40 Other interest expense specifically allocable under Regulations section 1.861-10T . .							
41 Other interest expense—business .							
42 Other interest expense—investment .							
43 Other interest expense—passive activity							
44 Section 59(e)(2) expenditures, excluding R&E expenses on line 32							
45 Foreign taxes not creditable but deductible							
46 Section 986(c) loss							
47 Section 987 loss							
48 Section 988 loss							
49 Other allocable deductions							
50 Other apportioned share of deductions							
51 Reserved							
52 Reserved							
53 Reserved							
54 Total deductions (combine lines 25 through 53) ▶							
55 Net income (loss) (subtract line 54 from line 24)							

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Part III Other Information for Preparation of Form 1116 or 1118

Section 1 – R&E Expenses Apportionment Factors

Description	(a) U.S. source	Foreign Source	
		(b) Foreign branch category income	(c) Passive category income
1 Sales by SIC code			
A SIC code			
B SIC code			
C SIC code			
D SIC code			
E SIC code			
F SIC code			
2 Gross income by SIC code			
A SIC code			
B SIC code			
C SIC code			
D SIC code			
E SIC code			
F SIC code			

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

Section 1 – R&E Expenses Apportionment Factors (continued)

	Foreign Source		(f) Sourced by partner	(g) Total
	(d) General category income	(e) Other (category code _____) (country code _____)		
1				
A				
B				
C				
D				
E				
F				
2				
A				
B				
C				
D				
E				
F				

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3 Exclusive apportionment (with respect to total R&E expenses entered on Part II, line 32):

A R&E expense with respect to activity performed in the United States

(i) SIC code _____

(ii) SIC code _____

(iii) SIC code _____

B R&E expense with respect to activity performed outside the United States

(i) SIC code _____

(ii) SIC code _____

(iii) SIC code _____

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

Section 3—Foreign Taxes

Description	(a) Type of tax	(b) Section 951A category income		(c) Foreign branch category income		
		U.S.	Foreign	U.S.	Foreign	Partner
1 Direct (section 901 or 903) foreign taxes: <input type="checkbox"/> Paid <input type="checkbox"/> Accrued						
A _____						
B _____						
C _____						
D _____						
E _____						
F _____						
2 Reduction of taxes						
A Taxes on foreign mineral income						
B Reserved						
C International boycott provisions						
D Failure to file penalties						
E Taxes with respect to splitter arrangements						
F Taxes on foreign corporate distributions						
G Other						
3 Foreign tax redeterminations						
A _____ Related tax year ▶						
B _____ Related tax year ▶						
C _____ Related tax year ▶						
4 Reserved						
5 Reserved						
6 Reserved						

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

Section 3—Foreign Taxes (continued)

	(d) Passive category income			(e) General category income			(f) Other (category code _____) (country code _____)	(g) Total
	U.S.	Foreign	Partner	U.S.	Foreign	Partner		
1								
A								
B								
C								
D								
E								
F								
2								
A								
B								
C								
D								
E								
F								
G								
3								
A								
B								
C								
4								
5								
6								

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Part IV Other Foreign Transaction Information for U.S. Partners

Section 1 – Information on Partner’s Section 250 Deduction With Respect to Foreign-Derived Intangible Income (FDII)

Description	(a) U.S. source	Foreign Source	
		(b) Passive category income	
1 Gross receipts			
a General property			
b Intangible property			
c Services			
2 COGS			
3 Foreign-derived gross receipts			
a General property			
b Intangible property			
c Services			
4 COGS attributable to the amount on line 3			
5 Deductions properly allocable to the amount on line 1			
a General property			
b Intangible property			
c Services			
6 Deductions properly allocable to the amount on line 3			
a General property			
b Intangible property			
c Services			
7 Partnership qualified business asset investment			

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Part IV Other Foreign Transaction Information for U.S. Partners *(continued)*

Section 1 – Information on Partner’s Section 250 Deduction With Respect to Foreign-Derived Intangible Income (FDII) *(continued)*

	Foreign Source		(e) Sourced by partner	(f) Total
	(c) General category income	(d) Other (category code _____) (country code _____)		
1				
a				
b				
c				
2				
3				
a				
b				
c				
4				
5				
a				
b				
c				
6				
a				
b				
c				
7				

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Section 2 – Other Tax Information

Description	(a) U.S. source	Foreign Source	
		(b) Section 951A category income	(c) Foreign branch category income
1 Section 743(b) positive income adjustment			
2 Section 743(b) negative income adjustment			
3 Reserved			
4 Reserved			

	Foreign Source			(g) Sourced by partner	(h) Total
	(d) Passive category income	(e) General category income	(f) Other (category code _____) (country code _____)		
1					
2					
3					
4					

Part IV Other Foreign Transaction Information for U.S. Partners *(continued)*

Section 3—Distributions From Foreign Corporations to Partnership

(a) Name of distributing foreign corporation		(b) EIN or reference ID number	(c) Date of distribution	(d) Functional currency of distributing foreign corporation	(e) Amount of distribution in functional currency
A					
B					
C					
D					
E					
F					
G					
H					
I					
J					
K					
L					
M					
N					
O					

	(f) Amount of E&P distribution in functional currency	(g) Spot rate (functional currency to U.S. dollars)	(h) Amount of distribution in U.S. dollars	(i) Amount of E&P distribution in U.S. dollars	(j) Qualified foreign corporation	(k) Reserved
A					<input type="checkbox"/>	
B					<input type="checkbox"/>	
C					<input type="checkbox"/>	
D					<input type="checkbox"/>	
E					<input type="checkbox"/>	
F					<input type="checkbox"/>	
G					<input type="checkbox"/>	
H					<input type="checkbox"/>	
I					<input type="checkbox"/>	
J					<input type="checkbox"/>	
K					<input type="checkbox"/>	
L					<input type="checkbox"/>	
M					<input type="checkbox"/>	
N					<input type="checkbox"/>	
O					<input type="checkbox"/>	

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Part V Information on Partner's Section 951(a)(1) and Section 951A Inclusions

- a** Separate category (enter code) _____
- b** If box is checked, this is completed with respect to U.S. source income

	(a) Name of CFC	(b) EIN or reference ID number	(c) Partner's share of CFC items through its ownership in the partnership ("partner's share")	(d) Partner's share of subpart F income	(e) Partner's section 951(a)(1)(B) inclusion	(f) Tested income
A						
B						
C						
D						
E						
F						
G						
H						
I						
J						
K						

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1 Partner's total (sum for all CFCs) _____

	(g) Tested loss	(h) Partner's share of tested income	(i) Partner's share of tested loss	(j) Partner's share of Qualified Business Asset Investment (QBAI)	(k) Partner's share of the tested loss QBAI amount	(l) Partner's share of tested interest income	(m) Partner's share of tested interest expense
A							
B							
C							
D							
E							
F							
G							
H							
I							
J							
K							
Partner's total (sum for all CFCs) ▶							

Part VII Partner's Share of Partnership's Interest in Foreign Corporation Income (Section 960)

- A** EIN or reference ID number of controlled foreign corporation _____
- B** Separate category. See instructions _____
- C** If PAS was entered on line B, applicable grouping under Regulations section 1.904-4(c). See instructions _____
- D** Box is checked if there is more than one source country for a line. See attachment and instructions
- E** Box is checked if U.S. source income
- F** Box is checked if FORI or FOGEI

<i>Amounts are in functional currency unless otherwise noted. See instructions.</i>	(a) Country code	(b) Partner's share of net income	Reserved	Reserved
1 Subpart F income groups				
a Dividends, interest, rents, royalties, and annuities (total)				
i Unit				
ii Unit				
b Net gain from certain property transactions (total)				
i Unit				
ii Unit				
c Net gain from commodities transactions (total)				
i Unit				
ii Unit				
d Net foreign currency gain (total)				
i Unit				
ii Unit				
e Income equivalent to interest (total)				
i Unit				
ii Unit				
f Foreign base company sales income (total)				
i Unit				
ii Unit				
g Foreign base company services income (total)				
i Unit				
ii Unit				
h Full inclusion foreign base company income (total)				
i Unit				
ii Unit				
i Insurance income (total)				
j International boycott income (total)				
k Bribes, kickbacks, and other payments (total)				
l Section 901(j) (total)				
2 Recaptured subpart F income				
3 Tested income group (total)				
i Unit				
ii Unit				
4 Residual income group (total)				
5 Total ▶				

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Part VIII Partner's Information for Base Erosion and Anti-Abuse Tax (Section 59A)

Section 1—Applicable Taxpayer (see instructions)

Description	(a) Total	(b) Total base erosion payments	(c) Total base erosion tax benefits
1 Gross receipts for section 59A(e)			
2 Gross receipts for the first preceding year			
3 Gross receipts for the second preceding year			
4 Gross receipts for the third preceding year			
5 Amounts included in the denominator of the base erosion percentage as described in Regulations section 1.59A-2(e)(3)			

Section 2—Base Erosion Payments and Base Erosion Tax Benefits (see instructions)

6 Reserved			
7 Reserved			
8 Purchase or creations of property rights for intangibles (patents, trademarks, etc.)			
9 Rents, royalties, and license fees			
10a Compensation/consideration paid for services not excepted by section 59A(d)(5)			
b Compensation/consideration paid for services excepted by section 59A(d)(5)			
11 Interest expense			
12 Payments for the purchase of tangible personal property			
13 Premiums and/or other considerations paid or accrued for insurance and reinsurance as covered by sections 59A(d)(3) and 59A(c)(2)(A)(iii)			
14a Nonqualified derivative payments			
b Qualified derivative payments excepted by section 59A(h)			
15 Payments reducing gross receipts made to surrogate foreign corporation			
16 Other payments—specify ▶			
17 Base erosion tax benefits related to payments reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at 30% (0.30) statutory withholding tax rate			
18 Portion of base erosion tax benefits reported on lines 6 through 16, on which tax is imposed by section 871 or 881, with respect to which tax has been withheld under section 1441 or 1442 at reduced withholding rate pursuant to income tax treaty. This is the percentage withheld divided by 30% (0.30) times tax benefit. See instructions			
19 Total base erosion tax benefits (The sum of line 17 and line 18 subtracted from the sum of lines 8 through 16.) ▶			
20 Reserved			
21 Reserved			
22 Reserved			

Part IX Foreign Partner's Character and Source of Income and Deductions

Section 1—Gross Income

Description	(a) Total	(b) Partner determination	Partnership Determination				
			Non-ECI			ECI	
			(c) U.S. source (FDAP)	(d) U.S. source (other)	(e) Foreign source	(f) U.S. source	(g) Foreign source
1 Ordinary business income (gross)							
2 Gross rental real estate income							
3 Other gross rental income							
4 Guaranteed payments for services							
5 Guaranteed payments for use of capital							
6 Interest income							
7 Dividends							
8 Dividend equivalents							
9 Royalties and license fees							
10 Net short-term capital gain							
11 Net long-term capital gain							
12 Collectibles (28%) gain							
13 Unrecaptured section 1250 gain							
14 Net section 1231 gain							
15 Reserved							
16 Reserved							
17 Reserved							
18 Reserved							
19 Reserved							
20 Other income (loss) not included on lines 1 through 19							
21 Gross income (sum of lines 1 through 20) ▶							

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

Section 2—Deductions, Losses, and Net Income

Description	(a) Total	(b) Partner determination	Partnership Determination				
			Non-ECI			ECI	
			(c) U.S. source (FDAP)	(d) U.S. source (other)	(e) Foreign source	(f) U.S. source	(g) Foreign source
1 Expenses related to ordinary business income (gross)							
2 Research and experimental expenses							
3 Expenses from rental real estate							
4 Expenses from other rental activities							
5 Royalty and licensing expenses							
6 Section 179 deduction							
7 Interest expense on U.S.-booked liabilities							
8 Interest expense directly allocable under Regulations sections 1.882-5(a)(1)(ii)(B) and 1.861-10T							
9 Other interest expense							
10 Section 59(e)(2) expenditures							
11 Net short-term capital loss							
12 Net long-term capital loss							
13 Collectibles loss							
14 Net section 1231 loss							
15 Other losses							

16 Charitable contributions							
17 Other ▶							
18 Other ▶							
19 Reserved							
20 Reserved							
21 Reserved							
22 Reserved							
23 Reserved							
24 Total (sum of lines 1 through 23)							
25 Net income (loss) (line 21 (Section 1) minus line 24 (Section 2)) ▶							

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Part IX Foreign Partner's Character of Income and Deductions *(continued)*

Section 3—Allocation and Apportionment Methods for Deductions

1 Gross income
a Gross ECI _____
b Worldwide gross income _____

2 Assets
a Average U.S. assets (inside basis) _____
b Worldwide assets _____

3 Liabilities
a U.S.-booked liabilities of partnership _____
b Directly allocated partnership indebtedness _____

4 Personnel
a Personnel of U.S. trade or business _____
b Worldwide personnel _____

5 Gross receipts from sales or services by SIC code

(i) SIC code	(ii) ECI	(iii) Worldwide
a	_____	_____
b	_____	_____

6 Gross income by SIC code

(i) SIC code	(ii) ECI	(iii) Worldwide
a	_____	_____
b	_____	_____

7 Other allocation and apportionment key

(i) Key/Factor	(ii) Allocation
a	_____
b	_____

8 Other allocation and apportionment key

(i) Key/Factor	(ii) Allocation
a	_____
b	_____

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

Section 4—Section 871(m) Covered Partnerships

1 Box is checked if the partnership is a publicly traded partnership as defined in section 7704(b) and the partnership is a covered partnership as defined in Regulations section 1.871-15(m)(1) or directly or indirectly holds an interest in a lower-tier partnership that is a covered partnership

2 Number of units held by the partner ▶ _____

3 For each allocation period, see the following information for the number of units specified on line 2:

(i) Beginning of allocation period	(ii) End of allocation period	(iii) Dividends	(iv) Dividend equivalents	(v) Total

Part X Foreign Partner's Distributive Share of Deemed Sale Items on Transfer of Partnership Interest

A Date of transfer of the partnership interest . ▶ _____ **B1** Percentage interest in the partnership transferred ▶ _____

B2 Number of units in the partnership transferred ▶ _____ **B3** Reserved ▶ _____

C Check if: **1** Capital **2** Preferred **3** Profits **4** Other

		Partner's Distributive Share	
1	Total ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	1	
2	Aggregate effectively connected ordinary gain (loss) that would be recognized on the deemed sale of section 751 property	2	
3	Aggregate effectively connected capital gain (loss) that would be recognized on the deemed sale of non-section 751 property	3	
4	Gain (loss) that would be recognized under section 897(g) on the deemed sale of U.S. real property interests	4	
5	Reserved <input type="checkbox"/>		
6	Reserved	6	
7	Reserved	7	
8	Reserved	8	