1040-NR ATS Test Scenario 3 Taxpayer: Lisa Cranberry

SSN: 123-00-3333

Test Scenario 3 includes the following forms:

- Form 1040-NR
- Form W-2
- Form 1040-NR Schedule NEC
- Form 1040-NR Schedule OI
- Form 1040 Schedule 1
- Form 1040 Schedule E
- Form 8805
- Form 8854

Additional information:

- The taxpayer expatriated in 2013. She has been a resident of the UK since January 1, 2014.
- The taxpayer received eligible deferred compensation in 2022 for services rendered to a US employer in previous years.
- The Taxpayer received a distributive share of earnings in 2022 from the US partnership.

Department of the Treasury-Internal Revenue Service IRS Use Only-Do not write **U.S. Nonresident Alien Income Tax Return** OMB No. 1545-0074 or staple in this space. See separate For the year Jan. 1-Dec. 31, 2022, or other tax year beginning . 2022, endina instructions. Filing ☐ Qualifying surviving spouse (QSS) ☐ Married filing separately (MFS) ☐ Estate Trust ✓ Single **Status** If you checked the QSS box, enter the child's name if the qualifying person is a child but not your dependent: Check only one box. Your first name and middle initial Last name Your identifying number (see instructions) 123 00 3333 Lisa Cranberry Home address (number and street). If you have a P.O. box, see instructions. Apt. no. 7613 Beatle Way City, town, or post office. If you have a foreign address, also complete spaces below. ZIP code State Foreign postal code Foreign country name Foreign province/state/county UK NW61JD Digital Assets At any time during 2022, did you: (a) receive (as a reward, award, or payment for property or services); or (b) sell, exchange, gift, or otherwise dispose of a digital asset (or a financial interest in a digital asset)? (See instructions.) _. . 🗌 Yes 🗹 No (4) Check the box if qualifies for (see inst.): **Dependents** (2) Dependent's Credit for other (see instructions): Child tax credit (1) First name Last name identifying number (3) Relationship to you dependents If more than four dependents, see instructions and check here Total amount from Form(s) W-2, box 1 (see instructions) Income **Effectively** b Household employee wages not reported on Form(s) W-2. 1b **Connected** C 1c Medicaid waiver payments not reported on Form(s) W-2 (see instructions) 1d With U.S. d Taxable dependent care benefits from Form 2441, line 26 . . . Trade or 1e e Employer-provided adoption benefits from Form 8839, line 29 **Business** 1f Wages from Form 8919, line 6 19 q Attach h Other earned income (see instructions) 1h Form(s) W-2, Reserved for future use . . . 1042-S, SSA-1042-S. Reserved for future use . . . 1j j RRB-1042-S, k Total income exempt by a treaty from Schedule OI (Form 1040-NR), item L, and 8288-A here. Also attach z Add lines 1a through 1h . 1z Form(s) 2a Tax-exempt interest . . . **b** Taxable interest . 2b 1099-R if 3a Qualified dividends . . 3b За **b** Ordinary dividends ... tax was withheld. 4a 4a IRA distributions . . **b** Taxable amount . 4b 5a If you did not 5a Pensions and annuities . . . **b** Taxable amount . 5b get a Form 6 6 W-2, see 7 Capital gain or (loss). Attach Schedule D (Form 1040) if required. If not required, check here . . . 7 instructions. 8 8 9 Add lines 1z, 2b, 3b, 4b, 5b, 7, and 8. This is your total effectively connected income 9 10 Adjustments to income: а 10a 10b h Reserved for future use . . . C Enter the amount from line 10a. These are your total adjustments to income . 10d d Subtract line 10d from line 9. This is your adjusted gross income 11 11

Itemized deductions (from Schedule A (Form 1040-NR)) or, for certain residents of India, standard

Qualified business income deduction from Form 8995 or Form 8995-A

Exemptions for estates and trusts only (see instructions)

Subtract line 14 from line 11. If zero or less, enter -0-. This is your taxable income

Add lines 13a and 13b

Add lines 12 and 13c

13a

14

h

. .

13a 13b 12

13c

14

15

Form 1040-NR (2022)								Page 2
Tax and	16	Tax (see instructions). Check if a	ny from Fo	orm(s): 1 🗌 8	814 2 🗌 497	2 3 🗌		16	
Credits	17	Amount from Schedule 2 (Form 1040), line 3							
	18	Add lines 16 and 17						18	
	19	Child tax credit or credit for oth	19						
	20	Amount from Schedule 3 (Form	1040), line	€8				20	
	21	Add lines 19 and 20						21	
	22	Subtract line 21 from line 18. If	zero or les	s, enter -0	1 100 1 100		PO 11	22	
	23a	Tax on income not effectively or Schedule NEC (Form 1040-NR),				23a			
	b	Other taxes, including self-emp				200			
		line 21				23b		-	
- 4	C	Transportation tax (see instruction tax (see instruction)				23c	450	-	
- 10	d	Add lines 23a through 23c .				- 3		23d	1//)
-	24	Add lines 22 and 23d. This is yo		ix		11/1/		24	
Payments	25	Federal income tax withheld fro		7		or.			- Committee
	a	Form(s) W-2				25a			
	b	Form(s) 1099				25b	_		
	C .	Other forms (see instructions)	The second second	-	1	25c	-	-	
	d	Add lines 25a through 25c .						25d	
	e	Form(s) 8805						25e	
	f	Form(s) 8288-A						25f	
	g	Form(s) 1042-S						25g	
	26	2022 estimated tax payments a						26	
	27	Reserved for future use				27		-	
	28	Additional child tax credit from		•		28		-	
	29	Credit for amount paid with For				29		- 1	
	30	Reserved for future use				30			
	31	Amount from Schedule 3 (Form	• • • • • • • • • • • • • • • • • • • •			31			
	32	Add lines 28, 29, and 31. These						32	
	33	Add lines 25d, 25e, 25f, 25g, 26						33	
Refund	34	If line 33 is more than line 24, so				•	_	34	
	35a	Amount of line 34 you want refu	ınded to y	/ou . If Form 888			_	35a	
Direct deposit?	b	Routing number c Type:							
See instructions.	d	Account number		<u> </u>					
	е	If you want your refund check r	nailed to a	ın address outsi	de the United State	es not shown	on page 1,		
								- 1	
	36	Amount of line 34 you want app				36			
Amount	37	Subtract line 33 from line 24. Th		_					
You Owe		For details on how to pay, go to	4.0	gov/Payments o	see instructions.			37	
	38	Estimated tax penalty (see instr				38			
Third	Do yo	ou want to allow another person to	o discuss t	this return with t	he IRS? See instru		Yes. Comp		ow. L No
Party	Desig			Phone	•		sonal identif	ication,	
Designee	name	***************************************		no.			nber (PIN)		
		penalties of perjury, I declare that I hat they are true, correct, and complete.							
Sign			Deciaration			SG OIT AN INTONIN			ent you an Identity
-	Your	signature		Date	Your occupation				PIN, enter it here
Here	1	sa Cranberry		3/15/2023				inst.)	
	Phon			Email address	•		, , , ,		
Doid		rer's name	Preparei	r's signature		Date	PTIN	I	Check if:
Paid	Tim	Fields		n Fields	L	3/12/202	93		☐ Self-employed
Preparer		name Forever LLC	,	, , , , , , , , , , , , , , , , , , , ,		; <u> </u>	Phone n	o. 20	3-111-4444
Use Only		s address 1500 Cook Ave	nue Sta	mford CT	06901		Firm's E		-5556664
_		.555 5551 7 1 1 5							

	a Employee's social security number 123-00-3333	OMB No. 1545	÷0008	Safe, accurate, FAST! Use	Visit the IRS website at www.irs.gov/efile
b Employer identification number (EIN)		1 Wag	ges, tips, other compensation	2 Federal income tax withheld
00-5559991				2,950,000	990,000
c Employer's name, address, and a	ZIP code		3 Soc	cial security wages	4 Social security tax withheld
Cross Athletics 5215 Wembley Place		-	5 Me	edicare wages and tips	6 Medicare tax withheld
London, UK NW61JI)		7 Soc	cial security tips	8 Allocated tips
d Control number		ı	9		10 Dependent care benefits
e Employee's first name and initial	Last name	Suff.	11 No	nqualified plans	12a See instructions for box 12
Lisa Cranberry			13 State	tutory Retirement Third-party playee plan sick pay	12b
7613 Beatle Way		- 1			8
London, UK NW61JI	0		14 Oth	ler	12c
					12d
f Employee's address and ZIP cod	е				
15 State Employer's state ID numb	er 16 State wages, tips, etc.	17 State incom	e tax	18 Local wages, tips, etc.	19 Local income tax 20 Locality name
1					

Form W-2 Wage and Tax Statement



Department of the Treasury-Internal Revenue Service

Copy B—To Be Filed With Employee's FEDERAL Tax Return. This information is being furnished to the Internal Revenue Service.

SCHEDULE NEC (Form 1040-NR)

Tax on Income Not Effectively Connected With a U.S. Trade or Business

Your identifying number

Department of the Treasury Internal Revenue Service

Name shown on Form 1040-NR

Go to www.irs.gov/Form1040NR for instructions and the latest information. Attach to Form 1040-NR.

Attachment Sequence No. 7B

OMB No. 1545-0074

123-00-3333 Lisa Cranberry Enter amount of income under the appropriate rate of tax. See instructions. (d) Other (specify) (a) 10% Nature of Income **(b)** 15% (c) 30% % Dividends and dividend equivalents: Dividends paid by U.S. corporations 1a Dividends paid by foreign corporations . 1b Dividend equivalent payments received with respect to section 871(m) transactions 1c 2 Interest: 2a 2b 2c Industrial royalties (patents, trademarks, etc.) 3 4 5 Real property income and natural resources royalties . . . 6 1.800 7 8 9 10 Gambling-Residents of Canada only. Enter net income in column (c). If zero or less, enter -0-. Winnings ____ 10c Gambling winnings - Residents of countries other than Canada. 11 Other (specify): 12 12 13 13 14 14 15 Tax on income not effectively connected with a U.S. trade or business. Add columns (a) through (d) of line 14. Enter the total here and on Form 1040-NR, line 23a **Capital Gains and Losses From Sales or Exchanges of Property** Enter only the capital gains and 16 (a) Kind of property and description (f) LOSS (g) GAIN (b) Date acquired (c) Date sold (d) Sales price (e) Cost or losses from property sales or (if necessary, attach statement of If (e) is more than (d), If (d) is more than (e). other basis mm/dd/yyyy mm/dd/yyyy exchanges that are from sources subtract (d) from (e). descriptive details not shown below) subtract (e) from (d). within the United States and not effectively connected with a U.S. business. Do not include a gain or loss on disposing of a U.S. real property interest; report these gains and losses on Schedule D (Form 1040). Report property sales or exchanges that are effectively connected with a U.S. business on Schedule D (Form 1040), 18 Capital gain. Combine columns (f) and (q) of line 17. Enter the net gain here and on line 9 above. If a loss, enter -0-18 Form 4797, or both.

SCHEDULE OI (Form 1040-NR)

Department of the Treasury

Internal Revenue Service

Other Information

Go to www.irs.gov/Form1040NR for instructions and the latest information.

Attach to Form 1040-NR.

Answer all questions.

OMB No. 1545-0074

Attachment Sequence No. **7C**

Name shown on Form 1040-NR Your identifying number 123-00-3333 Lisa Cranberry Of what country or countries were you a citizen or national during the tax year? UK In what country did you claim residence for tax purposes during the tax year? UK В C Have you ever applied to be a green card holder (lawful permanent resident) of the United States? Were you ever: ☐ Yes ✓ No 1. A U.S. citizen? . 2. A green card holder (lawful permanent resident) of the United States? ☐ No ✓ Yes If you answer "Yes" to (1) or (2), see Pub. 519, chapter 4, for expatriation rules that apply to you. If you had a visa on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year. Visa Waiver ✓ Yes F If you answered "Yes," indicate the date and nature of the change: 1/15/2013 Expatriation List all dates you entered and left the United States during 2022. See instructions. G Note: If you're a resident of Canada or Mexico AND commute to work in the United States at frequent intervals. Canada check the box for Canada or Mexico and skip to item H . Mexico **Date departed United States** Date entered United States **Date entered United States Date departed United States** mm/dd/yy mm/dd/yy mm/dd/yy mm/dd/yy 01/26/22 01/28/22 06/20/22 06/22/22 09/12/22 03/12/22 03/16/22 09/14/22 04/25/22 04/26/22 10/10/22 10/11/22 11/27/22 05/10/22 11/30/22 05/08/22 Give number of days (including vacation, nonworkdays, and partial days) you were present in the United States during: н 2020 21 , 2021 <u>20</u> , and 2022 <u>27</u> . ✓ Yes ☐ No If "Yes," give the latest year and form number you filed: 2021-NR ☐ No ☐ Yes If "Yes," did the trust have a U.S. or foreign owner under the grantor trust rules, make a distribution or loan to a ☐ No ☐ Yes ✓ Yes ☐ No **☑** No If "Yes," did you use an alternative method to determine the source of this compensation? Income Exempt From Tax-If you are claiming exemption from income tax under a U.S. income tax treaty with a foreign country, complete (1) through (3) below. See Pub. 901 for more information on tax treaties. 1. Enter the name of the country, the applicable tax treaty article, the number of months in prior years you claimed the treaty benefit, and the amount of exempt income in the columns below. Attach Form 8833 if required. See instructions. (a) Country (b) Tax treaty article (c) Number of months (d) Amount of exempt claimed in prior tax years income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 □No ☐ Yes If "Yes," attach a copy of the Competent Authority determination letter to your return. Check the applicable box if: 1. This is the first year you are making an election to treat income from real property located in the United States as effectively connected 2. You have made an election in a previous year that has not been revoked, to treat income from real property located in the United

SCHEDULE 1 (Form 1040)

Additional Income and Adjustments to Income

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service

Name(s) shown on Form 1040, 1040-SR, or 1040-NR

Attach to Form 1040, 1040-SR, or 1040-NR. Go to www.irs.gov/Form1040 for instructions and the latest information.

Attachment Sequence No. **01** Your social security number

Lisa	Cranberry	123-00-	3333		
Par					
1	Taxable refunds, credits, or offsets of state and local income taxes	1	100	. 1	1
2a	Alimony received		- 66 - 1	. 2a	
b	Date of original divorce or separation agreement (see instructions):	30			
3	Business income or (loss). Attach Schedule C			. 3	
4	Other gains or (losses). Attach Form 4797				
5	Rental real estate, royalties, partnerships, S corporations, trusts, etc. Att.	ach S	Schedule E	5	2,000
6	Farm income or (loss). Attach Schedule F	10	1	. 6	
7	Unemployment compensation	ж.		7	
8	Other income:	1			
а	Net operating loss	8a	()	
b	Gambling	8b			
С	Gambling	8c			
d	Foreign earned income exclusion from Form 2555	8d	Į.)	
е	Income from Form 8853	8e			
f	Income from Form 8889	8f			
g	Alaska Permanent Fund dividends	8g			
h	Jury duty pay	8h			
i	Prizes and awards	8i			
j	Activity not engaged in for profit income	8j			
k	Stock options	8k			
ı	Income from the rental of personal property if you engaged in the rental				
	for profit but were not in the business of renting such property	81			
m	Olympic and Paralympic medals and USOC prize money (see				
	instructions)	8m			
n	Section 951(a) inclusion (see instructions)	8n			
0	Section 951A(a) inclusion (see instructions)	80			
р	Section 461(I) excess business loss adjustment	8p	-		
q	Taxable distributions from an ABLE account (see instructions)	8q			
r	Scholarship and fellowship grants not reported on Form W-2	8r			
S	Nontaxable amount of Medicaid waiver payments included on Form				
	1040, line 1a or 1d	8s	()	
t	Pension or annuity from a nonqualifed deferred compensation plan or				
	a nongovernmental section 457 plan	8t			
u	Wages earned while incarcerated	8u			
Z	Other income. List type and amount:				
		8z			
9	Total other income. Add lines 8a through 8z			. 9	
10	Combine lines 1 through 7 and 9. Enter here and on Form 1040, 1040-SF	R, or 1	040-NR, line	e 8 10	

12	Educator expenses	-basis government	11	
	officials. Attach Form 2106	-basis government		
			12	
	14 ·		13	
	Moving expenses for members of the Armed Forces. Attach Form 3903		14	
15	Deductible part of self-employment tax. Attach Schedule SE	2	15	
16	Self-employed SEP, SIMPLE, and qualified plans		16	
17	Self-employed SEP, SIMPLE, and qualified plans	20	17	
18	Penalty on early withdrawal of savings		18	
19a	Alimony paid		19a	
b	Recipient's SSN	000		
С	Date of original divorce or separation agreement (see instructions):	11-1-		
20	IRA deduction	1 1 1 6 2 1 6	20	
			21	
	Reserved for future use		22	
	Archer MSA deduction	4 4 1 1 1 1 1 1	23	
	Other adjustments:			
		24a		
		24b		
		24c		
		24d		
	Repayment of supplemental unemployment benefits under the Trade Act of 1974	24e		
		24f		
		24g		
	Attorney fees and court costs for actions involving certain unlawful discrimination claims (see instructions)	24h		
	Attorney fees and court costs you paid in connection with an award from the IRS for information you provided that helped the IRS detect			
	-	24i	4	
-	_	24j	-	
		24k		
		24z		
	Total other adjustments. Add lines 24a through 24z		25	
	Add lines 11 through 23 and 25. These are your adjustments to income . Form 1040 or 1040-SR, line 10, or Form 1040-NR, line 10a		26	

SCHEDULE E (Form 1040)

Supplemental Income and Loss

(From rental real estate, royalties, partnerships, S corporations, estates, trusts, REMICs, etc.)

Attach to Form 1040, 1040-SR, 1040-NR, or 1041. Go to www.irs.gov/ScheduleE for instructions and the latest information.

OMB No. 1545-0074

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

Attachment Sequence No. 13 Your social security number

Lisa	Cranberry					123-0	0-3333	
Part	Income or Loss From Rental Real Estate an	d Roya	Ities	·- ·				
	Note: If you are in the business of renting personal proper rental income or loss from Form 4835 on page 2, line 40.	rty, use S o	chedule C. S	See instr	uctions. If you	are an indi	vidual, rep	ort farm
A C	Did you make any payments in 2022 that would require you		rm(s) 1099	? See ir	structions .		. Ye	s 🗌 No
	f "Yes," did you or will you file required Form(s) 1099? .							
1a	Physical address of each property (street, city, state, ZIF			-	-	- 10		
Α								
В		0	- 0	70.7	\cap	100	1	
C	111111/1//	- //		71				
1b	Type of Property (from list below) 2 For each rental real estate properabove, report the number of fair			-	air Rental		nal Use	QJV
_	personal use days. Check the Qu		also .		Days	Da	iys	
B	if you meet the requirements to f	file as a	B	_	200			┝╌╠╌
C	qualified joint venture. See instru	uctions.			-			
	of Property:	- 10	1 0					
	Single Family Residence 3 Vacation/Short-Term Ren	ital 5	Land	7	Self-Rental			
	Multi-Family Residence 4 Commercial		Royalties		Other (desc			
	Walti Farmy Residence 4 Commercial		rioyanica					
					Propert	ties:		
ncom			A		В			С
3	Rents received							
4_	Royalties received	4			-			
Expen		_						
5	Advertising	5			-			
6	Auto and travel (see instructions)				-			
7	Cleaning and maintenance	8			-			
8	Commissions	9			1			
9 10	Insurance	10			-			
11	Management fees	11			+			
12	Mortgage interest paid to banks, etc. (see instructions)	12						
13	Other interest	13			+			
14	Repairs	14						
15	Supplies	15						
16	Taxes	16						
17	Utilities	17						
18	Depreciation expense or depletion	18						
19	Other (list)	19						
20	Total expenses. Add lines 5 through 19	20						
21	Subtract line 20 from line 3 (rents) and/or 4 (royalties). If							
	result is a (loss), see instructions to find out if you must							
	file Form 6198	21					4	
22	Deductible rental real estate loss after limitation, if any,				J			
	on Form 8582 (see instructions)	<u> </u>)(()	(
23a	Total of all amounts reported on line 3 for all rental prope			. 23a	+			
b	Total of all amounts reported on line 4 for all royalty prop				+			
C	Total of all amounts reported on line 12 for all properties				+			
d	Total of all amounts reported on line 18 for all properties			_				
е 24	Total of all amounts reported on line 20 for all properties					104		
24 05	Income. Add positive amounts shown on line 21. Do no					. 24	/	
25	Losses. Add royalty losses from line 21 and rental real esta						(
26	Total rental real estate and royalty income or (loss). here. If Parts II, III, IV, and line 40 on page 2 do not							
	Schedule 1 (Form 1040), line 5. Otherwise, include this ar		•			26		

Caution: The IRS compares amounts reported on your tax return with amounts shown on Schedule(s) K-1.

Part II	Income or Loss From Partnerships and S Corporations
	Note: If you report a loss, receive a distribution, dispose of stock, or receive the basic control of the basic co

reported anywhere on Form 1040, Form 1040-SR, or Form 1040-NR from all rental real estate activities in which you materially participated

	th	ote: If you report a loss, re le box in column (e) on line mount is not at risk, you m i	28 and att	ach the requ	ired basis co	mputation.	. If you i	report	a loss from an a	t-risk act		
27	passive	reporting any loss not e activity (if that loss wa tructions before comple	s not rep	orted on Fo		or unreim	burse		nership expen		you ansv	
28		(a) Name			(b) Enter P for partnership; S or S corporatio	foreig	gn		i) Employer fication number	basis co	heck if mputation quired	(f) Check if any amount is not at risk
Α	1	Fish and Chips			P	n partiei	SHIP	00-	1234567	1316		
В			AF	11/ 11/			-		120 100		<u> </u>	
С			11 /	11 1	9. 11		1			1		
D		-						= 4				
		Passive Income	and Los	s		100	No	npas	sive Income a	nd Los	s	
		g) Passive loss allowed ch Form 8582 if required)		ssive income Schedule K-1		passive loss e Schedule			(i) Section 179 expeduction from Form			assive income chedule K-1
Α	(atta	cri Form 6362 ii required)	Teles 1	000	(SE	e Schedule	K-1)	u.	eduction nom Port	11 4302	IIOIII 3	chedule K-1
B	1		2,	300		_	- 17	-				
	1			1 4	~	-	- 11		E Design		1.	
_ <u>D</u>	+						-	_				
29a	Totals											
b	Totals											
30	Add co	lumns (h) and (k) of line	29a .							30		
31	Add co	lumns (g), (i), and (j) of li	ne 29b.							31	(
32	Total p	artnership and S corp	oration in	come or (I	oss). Comb	ine lines	30 and	31		32		
Part	∭ Ir	ncome or Loss From	Estates	and Trus	ts							
33	(a) Name						(b) Emp identificatio					
Α						+ '	deminicatio	in namber				
В										+		
	1	Passive I	ncome a	nd Loss				N	lonpassive Inc	come a	nd Loss	
	(c)	Passive deduction or loss allo	wed	(d) Pa	assive income) Deduc	ction or loss		(f) Other inc	
	1	(attach Form 8582 if required)	from	Schedule K-1	\longrightarrow	fr	om Sci	hedule K-1	-	Schedu	le K-1
_ <u>A</u>	-											
<u>B</u>	Tatala											
34a	Totals											
b 35	Totals	l lumns (d) and (f) of line (240							35		
36		lumns (c) and (e) of line								36	/	
37		estate and trust income								37	\	
Pari		ncome or Loss From									l Holde	r
38			11041 20		nplover	(c) Excess			(d) Taxable inc			come from
•••		(a) Name		, , ,	ion number	Schedul	les Q, line		(net loss) fro Schedules Q, I			les Q, line 3b
						(500 111	oti dotion		Concedence 4,			
39	Combi	ne columns (d) and (e) or	nly. Enter	the result h	nere and inc	lude in th	e total	on lin	e 41 below .	39		
Part	V S	ummary										
40	Net far	m rental income or (loss	from Fo	rm 4835 . Al	lso, comple	te line 42	below			40		
41	Total in	ncome or (loss). Combi	ne lines 20	6, 32, 37, 39	9, and 40. E	nter the re	esult he	ere an	d on Schedule			
		n 1040), line 5								41		
42	Recon	ciliation of farming a	nd fishir	ng income	. Enter you	ur gross						
		and fishing income rep										
		1065), box 14, code B; S										
		d Schedule K-1 (Form 10	•				42	<u> </u>				
43		ciliation for real estate sional (see instructions										

Form **8805** (Rev. November 2019)

Foreign Partner's Information Statement of Section 1446 Withholding Tax

▶ Go to www.irs.gov/Form8805 for instructions and the latest information.

OMB No. 1545-0123

Form 8805 (Rev. 11-2019)

Cat. No. 10078E

Department of the Treasury Copy A for Internal Revenue Service Attach to Form 8804. , or tax year beginning , 20 and ending , 20 For partnership's calendar year Internal Revenue Service **b** U.S. identifying number 5a Name of partnership Foreign partner's name b U.S. Employer Identification Number (EIN) Lisa Cranberry 123-00-3333 00-1234567 Fish and Chips Address (if a foreign address, see instructions) Address (if a foreign address, see instructions) 7613 Beatle Way 42579 Prince Street London, UK NW61JD London, UK NW61JD 2 Account number assigned by partnership (if any) Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7. 3 Type of partner (specify—see instructions) SAME Country code of partner (enter two-letter code; see instructions) Withholding agent's U.S. EIN Check if the partnership identified on line 5a owns an interest in one or more partnerships Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a h 9 2,200 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: 10 Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc. 814 10 Schedule T—Beneficiary Information (see instructions) Name of beneficiary Address (if a foreign address, see instructions) U.S. identifying number of beneficiary b 12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions) 12 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions) 13 13

For Paperwork Reduction Act Notice, see separate Instructions for Forms 8804, 8805, and 8813.

Initial and Annual Expatriation Statement

, 2022, and ending For calendar year 2022 or other tax year beginning

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service Go to www.irs.gov/Form8854 for instructions and the latest information. Please print or type. Name

Attachment Sequence No. 112 Identifying number (see instructions)

Lisa	Cranberry				123-00-3333
Part		ation. For all filers.			
1	4.4.470.000.0000				Way London, UK NW61JD
2	Address of principal for				
3	Country of tax residence	ce (if different from line 2)			
4	Check the box that app	olies. See instructions.	or 5	20	22
		statement for persons when statement for persons when the statement for persons where the sta			
5	Date of expatriation un	der section 877A(g)(3) for	expatriating citizens and	l long-term residents. See	instructions.
	☐ Citizen				per .
	☐ Long-term reside	nt was a second	1 100000		
			n a treaty country. Date	e commencing to be trea	ated, for tax purposes, as a
		eaty country 1/1/2014		3	,
6	List all countries (include	ding the United States) of	which you are a citizen (see instructions).	
а	Name of country <u>UK</u>	:			
Ď	Date you became a citi	zen of each country listed	d in line 6a (see instruction	ons). 2/1/1965	
7	How you became a U.S	S. citizen 🔽 By birth	☐ By naturalization		
8	Date you became a U.S	3. lawful permanent resid	ent		
Part	II Initial Expatriat	tion Statement for Pe	rsons Who Expatriate	ed in 2022	
Secti	ion A Expatriation I		•		
1	1st Year	2nd Year	3rd Year	years ending before the da 4th Year	5th Year
	Before Expatriation	Before Expatriation	Before Expatriation	Before Expatriation	Before Expatriation
	\$	\$	\$	\$	\$
2	Enter your net worth or	n the date of your expatris	ation for tax purposes .		\$
3	Did you become at birt of, and taxed as a resid	th a U.S. citizen and a cit dent of, that other country	izen of another country, a	and do you continue to be	e a citizen □ Yes □ No
4				ited States for not more the	han 10 of · · · □ Yes □ No
5				en a U.S. resident for not n	nore than · · · □ Yes □ No
6				all of your tax obligations	for the 5

Section B Balance Sheet

List in U.S. dollars the fair market value and the U.S. adjusted basis of your assets and liabilities as of your expatriation date. For Lines 6 and 7, list in U.S. dollars the present value of your pensions and deferred compensation interests as of your expatriation date. For more details, see the instructions.

	Assets	(a) Fair market value (FMV)	(b) U.S. adjusted basis
1 2 3 4 5 a	Cash, including bank deposits	AS C	22
6	Pensions or similar retirement arrangements (both U.S. and		
	foreign). See instructions		
7	Deferred compensation (including stock options). See instructions		
8	Partnership interests. See instructions		
9	Assets held in trust. See instructions		
10	Beneficial interests in trusts not included in line 9. See instructions		
11	Intangibles used in the United States		
12	Intangibles used outside the United States		
13	Loans to U.S. persons		
14	Loans to foreign persons		
15	Real property located in the United States		
16	Real property located outside the United States		
17	Business property located in the United States		
18	Business property located outside the United States		
19 20	Other assets. See instructions		
20	Total assets. Add lines 1 through 5 and lines 6 through 19. Don't include amounts on line 5a in this total		
	Liabilities	Amount	
21	Installment obligations		
22	Mortgages, etc		
23	Other liabilities. See instructions		
24	Total liabilities. Add lines 21 through 23		
25	Net worth. Subtract line 24 from line 20, column (a)		

Form 885 Section		wned on Date of E	xnatriation				Page
	complete Section C		Apatilation				
	 Your average net than \$178,000, 	t income tax liability your net worth on ton line 6 in Section A	he date of your				
	• In Section A, you	checked "Yes" on I	ines 3, 4, and 6;	or			
	• In Section A, you	checked "Yes" on I	ines 5 and 6.		0		
•		igible deferred com many reduction in v				item under any	l Vas. 🗆 Na
	reaty with the Office	ed States					Yes 🗌 No
		ineligible deferred ur account on the da] Yes ☐ No
		terest in a specified re interest in the acc					Yes 🗌 No
d ,	Are you a beneficia	ry of a nongrantor t	rust? See instru	ctions	- 1511	🗔 . 🖯] Yes ☐ No
	trust (as determ	to elect under section nined for purposes ruling issued by the I	of section 877A	a) as of the day b			
		n or loss on the de		mark-to-market p	roperty. Caution:	Don't include in	column (a) any
Comple	te column (g) only if y	ou are deferring tax on	gain from any pro	perty listed in colum	nn (a).		
Desc	(a) ription of property	(b) Fair market value on day before date of expatriation	(c) Cost or other basis*	(d) Gain or (loss). Subtract (c) from (b)	(e) Gain after allocation of the exclusion amount (see instructions)	(f) Form or Schedule on which gain or loss is reported	(g) Amount of tax deferred (attach computations)

	on day before date of expatriation	Dasis*	from (b)	exclusion amount (see instructions)	on which gain or loss is reported	computations)
3 Total. Add the amounts	in column (d) and colu	mn (e)				
4 Total tax deferred. Add and on Part II, Section D	the amounts in colum					

^{*} You must identify as "(h)(2)" any property for which you are making the special basis election under section 877A(h)(2). This election is irrevocable. See the instructions for Part II, Section C, line 2, column (c).

- 1	Pac	10	4

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Sect	tion D Deferral of Tax						
	Election to defer tax. Y	ou can defer tax only if you have	provided adequate security. Ade	quate security is described in the			
	instructions.						
1	Are you electing to defer	tax under section 877A(b)?					
•			y right under any treaty of the	United States			
			osed because of section 877A .				
	triat would prevent asses	siment of collection of any tax imp	osed because of section of the .	· · · · L Yes L No			
	If you checked the "Yes"	box, continue to line 2. Otherwise	, don't complete lines 2 through 5.				
		345					
2	Enter the total tax you would have reported, absent the deferral election, on Form 1040 or						
			before the expatriation date abser				
	deferral election			2			
•		a name most of the tax year date					
3			ermined without regard to the am				
	attributable to section 87	7A(a). Attach computation		3			
4	Subtract line 3 from line 2	2. This is the amount of tax eligib	ole for deferral	4			
		-					
5	Enter the total tax deferre	ed from Part II, Section C, line 4, c	olumn (a)	5			
	Enter the total tax delent	sa ironi i art ii, oodiidii o, iiio i, o	Sidiliii (g)				
	If you are filing Form 1040 or 1040-SR, enter this amount in brackets to the left of the entry						
			ount in brackets to the left of the	entry			
	space for line 24. Identify	as Exp."					
	 If you are filing Form 10 	040-NR, enter this amount in brack	cets to the left of the entry space for	or line			
	24. Identify as "EXP."						
Part	M Annual Expatriat	ion Statement for Persons W	ho Expatriated Before 2022				
	<u> </u>	efer the payment of tax, complete	-				
	-						
	-	e deferred compensation, complet	e line 2.				
• If	you are a beneficiary of a r	nongrantor trust, complete line 3.					
1	Complete columns (a), (b	o), and (c) for all property on whic	h you deferred tax on a prior year	Form 8854. Complete column (d)			
	for any property you disp	posed of in 2022 and see the instru	ctions for Part III.	•			
	(a)	(b)	(c)	(d)			
	Description of property	Amount of mark-to-market gain or	Amount of tax deferred on prior year	Date of disposition (if any)			
		(loss) reported on prior year	Form 8854				
		Form 8854					

1		Amount withheld at source, if any	
	2,950,000	990,000	
3		AFT AO OF	
-		from a nongrantor trust for 2022?	☐ Yes ☑
	Amount of distribution	Amount withheld at source, if any	0
1	11/2/1/	mer a /II/	
3	~~~	7001 01 606	
n Her	best of my knowledge and of which preparer has any l	I declare that I have examined this form, including accompanying schedules and sbelief, it is true, correct, and complete. Declaration of preparer (other than filer) is be knowledge. Date Date	
i i	best of my knowledge and of which preparer has any I	belief, it is true, correct, and complete. Declaration of preparer (other than filer) is be knowledge.	ased on all infor
n Her	best of my knowledge and of which preparer has any I Your signature Print/Type preparer's name	belief, it is true, correct, and complete. Declaration of preparer (other than filer) is been chowledge. Date Preparer's signature Date Check	ased on all infor

Form **8854** (2022)