

Part I Foreign Partner's Interests in Certain Partnerships Transferred During Tax Year						
(a) Name of partnership	(b) Address	(c) Employer Identification Number (EIN)	(d)(1) Percentage interest transferred	(d)(2) Units transferred	(e) Date acquired (mm/dd/yyyy)	(f) Date transferred (mm/dd/yyyy)
A						
B						
C						
D						

Part II

Partnership Interest Transferred

Complete lines 1–9 if your Schedule K-3 (Form 1065), Part XIII, includes information on lines 1 through 6. Complete lines 1–3 and line 18 if your Schedule K-3 (Form 1065), Part XIII, includes information on line 7.

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| 1 | Proceeds/amount realized from the transfer of partnership interest |
| 2 | Section 705 outside basis |
| 3 | Total outside gain (loss) on transfer of partnership interest. Subtract line 2 from line 1 |
| 4 | Total outside ordinary gain (loss) that would be recognized on the deemed sale of section 751 property. Enter amount from Schedule K-3 (Form 1065), Part XIII, line 1 |
| 5 | Total outside capital gain (loss) that would be recognized on the transfer of the partnership interest. Subtract line 4 from line 3 |
| 6 | Aggregate effectively connected ordinary gain (loss) that would be recognized on the deemed sale of section 751 property. Enter amount from Schedule K-3 (Form 1065), Part XIII, line 2 |
| 7 | Aggregate effectively connected capital gain (loss) that would be recognized on the deemed sale of non-section 751 property. Enter amount from Schedule K-3 (Form 1065), Part XIII, line 3 |
| 8 | Recognized effectively connected ordinary gain (loss). Enter the smaller of line 4 or line 6. See instructions |
| 9 | Recognized outside effectively connected capital gain (loss). Enter the smaller of line 5 or line 7. See instructions |

Complete lines 10–17 only if the capital gain (loss) on line 5 is long term and an amount was reported on your Schedule K-3 (Form 1065), Part XIII, line 4 or line 5.

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| 10 | Total outside collectibles gain that would be recognized on the deemed sale of section 1(h)(5) assets. See instructions |
| 11 | Total outside unrecaptured section 1250 gain that would be recognized on the deemed sale of section 1(h)(6) assets. See instructions |
| 12 | Total outside look-through capital gains. Add lines 10 and 11 |
| 13 | Aggregate effectively connected collectibles gain that would be recognized on the deemed sale of section 1(h)(5) assets. Enter amount from Schedule K-3 (Form 1065), Part XIII, line 4 |
| 14 | Aggregate effectively connected unrecaptured section 1250 gain that would be recognized on the deemed sale of section 1(h)(6) assets. Enter amount from Schedule K-3 (Form 1065), Part XIII, line 5 |
| 15 | Total aggregate effectively connected look-through capital gains. Add lines 13 and 14 |
| 16 | If the amount entered on line 9 is from line 5, then enter the amount from line 12. If the amount entered on line 9 is from line 7, then enter the amount from line 15. See instructions for whether and where to report lines 10 and 11 or lines 13 and 14 on your Form 1040-NR |
| 17 | Recognized effectively connected residual long-term capital gain (loss). Subtract line 16 from line 9. See instructions |
| 18 | Capital gain (loss) that would be recognized under section 897(g) on the deemed sale of U.S. real property interests. Enter the amount from Schedule K-3 (Form 1065), Part XIII, line 7. See instructions |