

**Tax Year 2023 4626
MeF ATS Scenario 12**

Maker Company US, Inc. 00-0000012

FORMS REQUIRED: 1120, 4626

ATTACHMENTS:

None

Additional information:

The Employer Identification Number (EIN) is **00-0000012** for this scenario.

BINARY ATTACHMENT: None

HEADER INFO: Not on the actual return

Multiple Software Packages Used: Yes or No

Originator: EFIN: Self-select

Type: ERO

Practioner PIN:

EFIN: Self-select

PIN: Self-select

PIN Entered by – ERO

Signature Option: PIN

Officer: Name: Talbert Oaks

Title: President

Officer TIN: 000-00-3456

Taxpayer PIN: Self-Select

Phone: 301-555-1212

Email Address: talbertoaks@treefixr.com

DateSigned: 09/01/2024

Preparer: Name: Johnny Appleseed

Date Prepared: 09/01/2024

Tax Year 2023

1120 MeF ATS

Name Control: Form 1120 – Maker Company US, Inc. – MAKE

Total Prior Year Income Amt: \$39,989,850

IP Address: 112.112.112.112

A Check if: 1a Consolidated return (attach Form 851) <input type="checkbox"/> b Life/nonlife consolidated return <input type="checkbox"/> 2 Personal holding co. (attach Sch. PH) <input type="checkbox"/> 3 Personal service corp. (see instructions) <input type="checkbox"/> 4 Schedule M-3 attached <input checked="" type="checkbox"/>	TYPE OR PRINT	Name Maker Company US, Inc. Number, street, and room or suite no. If a P.O. box, see instructions. 2 Toolbox Street City or town, state or province, country, and ZIP or foreign postal code Denver, CO 80202	B Employer identification number 00-0000012 C Date incorporated D Total assets (see instructions) \$
E Check if: (1) <input type="checkbox"/> Initial return (2) <input type="checkbox"/> Final return (3) <input type="checkbox"/> Name change (4) <input type="checkbox"/> Address change			

Income	1a	Gross receipts or sales	1a	1,500,000.00
	b	Returns and allowances	1b	
	c	Balance. Subtract line 1b from line 1a	1c	1,500,000.00
	2	Cost of goods sold (attach Form 1125-A)	2	500,000.00
	3	Gross profit. Subtract line 2 from line 1c	3	1,000,000.00
	4	Dividends and inclusions (Schedule C, line 23)	4	
	5	Interest	5	
	6	Gross rents	6	
	7	Gross royalties	7	
	8	Capital gain net income (attach Schedule D (Form 1120))	8	
	9	Net gain or (loss) from Form 4797, Part II, line 17 (attach Form 4797)	9	
10	Other income (see instructions—attach statement)	10		
11	Total income. Add lines 3 through 10	11	1,000,000.00	
Deductions (See instructions for limitations on deductions.)	12	Compensation of officers (see instructions—attach Form 1125-E)	12	
	13	Salaries and wages (less employment credits)	13	800,000.00
	14	Repairs and maintenance	14	
	15	Bad debts	15	
	16	Rents	16	
	17	Taxes and licenses	17	
	18	Interest (see instructions)	18	
	19	Charitable contributions	19	
	20	Depreciation from Form 4562 not claimed on Form 1125-A or elsewhere on return (attach Form 4562)	20	
	21	Depletion	21	
	22	Advertising	22	
	23	Pension, profit-sharing, etc., plans	23	
	24	Employee benefit programs	24	
	25	Energy efficient commercial buildings deduction (attach Form 7205)	25	
	26	Other deductions (attach statement)	26	
	27	Total deductions. Add lines 12 through 26	27	800,000.00
	28	Taxable income before net operating loss deduction and special deductions. Subtract line 27 from line 11.	28	200,000.00
29a	Net operating loss deduction (see instructions)	29a		
b	Special deductions (Schedule C, line 24)	29b		
c	Add lines 29a and 29b	29c		
Tax, Refundable Credits, and Payments	30	Taxable income. Subtract line 29c from line 28. See instructions	30	200,000.00
	31	Total tax (Schedule J, Part I, line 11)	31	64,500.00
	32	Reserved for future use	32	
	33	Total payments and credits (Schedule J, Part II, line 23)	33	70,000.00
	34	Estimated tax penalty. See instructions. Check if Form 2220 is attached <input type="checkbox"/>	34	
	35	Amount owed. If line 33 is smaller than the total of lines 31 and 34, enter amount owed	35	
	36	Overpayment. If line 33 is larger than the total of lines 31 and 34, enter amount overpaid	36	5,500.00
37	Enter amount from line 36 you want: Credited to 2024 estimated tax Refunded	37	5,500.00	

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

Sign Here		President	
Signature of officer	Date	Title	

May the IRS discuss this return with the preparer shown below? See instructions. Yes No

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN P6666666
	Firm's name	Electronic Tax Filers, INC	Firm's EIN	00-0000011	
	Firm's address	100 Efile Drive Anytown, TX 78621	Phone no.	512-555-1212	

Schedule C Dividends, Inclusions, and Special Deductions (see instructions)		(a) Dividends and inclusions	(b) %	(c) Special deductions (a) × (b)
1	Dividends from less-than-20%-owned domestic corporations (other than debt-financed stock)		50	
2	Dividends from 20%-or-more-owned domestic corporations (other than debt-financed stock)		65	
3	Dividends on certain debt-financed stock of domestic and foreign corporations		See instructions	
4	Dividends on certain preferred stock of less-than-20%-owned public utilities		23.3	
5	Dividends on certain preferred stock of 20%-or-more-owned public utilities		26.7	
6	Dividends from less-than-20%-owned foreign corporations and certain FSCs		50	
7	Dividends from 20%-or-more-owned foreign corporations and certain FSCs		65	
8	Dividends from wholly owned foreign subsidiaries		100	
9	Subtotal. Add lines 1 through 8. See instructions for limitations		See instructions	
10	Dividends from domestic corporations received by a small business investment company operating under the Small Business Investment Act of 1958		100	
11	Dividends from affiliated group members		100	
12	Dividends from certain FSCs		100	
13	Foreign-source portion of dividends received from a specified 10%-owned foreign corporation (excluding hybrid dividends) (see instructions)		100	
14	Dividends from foreign corporations not included on line 3, 6, 7, 8, 11, 12, or 13 (including any hybrid dividends)			
15	Reserved for future use			
16a	Subpart F inclusions derived from the sale by a controlled foreign corporation (CFC) of the stock of a lower-tier foreign corporation treated as a dividend (attach Form(s) 5471) (see instructions)		100	
b	Subpart F inclusions derived from hybrid dividends of tiered corporations (attach Form(s) 5471) (see instructions)			
c	Other inclusions from CFCs under subpart F not included on line 16a, 16b, or 17 (attach Form(s) 5471) (see instructions)			
17	Global Intangible Low-Taxed Income (GILTI) (attach Form(s) 5471 and Form 8992)			
18	Gross-up for foreign taxes deemed paid			
19	IC-DISC and former DISC dividends not included on line 1, 2, or 3			
20	Other dividends			
21	Deduction for dividends paid on certain preferred stock of public utilities			
22	Section 250 deduction (attach Form 8993)			
23	Total dividends and inclusions. Add column (a), lines 9 through 20. Enter here and on page 1, line 4			
24	Total special deductions. Add column (c), lines 9 through 22. Enter here and on page 1, line 29b			

Schedule J Tax Computation and Payment (see instructions)

Part I—Tax Computation

1	Income tax. See instructions		1	42,000,000
2	Base erosion minimum tax amount (attach Form 8991)		2	
3	Corporate alternative minimum tax from Form 4626, Part II, line 13 (attach Form 4626)		3	22,500,000
4	Add lines 1, 2, and 3		4	64,500,000
5a	Foreign tax credit (attach Form 1118)	5a		
b	Credit from Form 8834 (see instructions)	5b		
c	General business credit (see instructions—attach Form 3800)	5c		
d	Credit for prior year minimum tax (attach Form 8827)	5d		
e	Bond credits from Form 8912	5e		
6	Total credits. Add lines 5a through 5e		6	
7	Subtract line 6 from line 4		7	64,500,000
8	Personal holding company tax (attach Schedule PH (Form 1120))		8	0
9a	Recapture of investment credit (attach Form 4255)	9a		
b	Recapture of low-income housing credit (attach Form 8611)	9b		
c	Interest due under the look-back method—completed long-term contracts (attach Form 8697)	9c		
d	Interest due under the look-back method—income forecast method (attach Form 8866)	9d		
e	Alternative tax on qualifying shipping activities (attach Form 8902)	9e		
f	Interest/tax due under section 453A(c)	9f		
g	Interest/tax due under section 453(l)	9g		
z	Other (see instructions—attach statement)	9z		
10	Total. Add lines 9a through 9z		10	0
11	Total tax. Add lines 7, 8, and 10. Enter here and on page 1, line 31		11	64,500,000

Part II—Payments and Refundable Credits

12	Reserved for future use		12	
13	Preceding year's overpayment credited to the current year		13	0
14	Current year's estimated tax payments		14	45,000,000
15	Current year's refund applied for on Form 4466		15	(0)
16	Combine lines 13, 14, and 15		16	45,000,000
17	Tax deposited with Form 7004		17	25,000,000
18	Withholding (see instructions)		18	0
19	Total payments. Add lines 16, 17, and 18.		19	70,000,000
20	Refundable credits from:			
a	Form 2439	20a		
b	Form 4136	20b		
c	Reserved for future use	20c		
z	Other (attach statement—see instructions)	20z		
21	Total credits. Add lines 20a through 20z		21	0
22	Elective payment election amount from Form 3800		22	0
23	Total payments and credits. Add lines 19, 21, and 22. Enter here and on page 1, line 33.		23	70,000,000

Schedule K Other Information (continued from page 4)

Table with 3 columns: Question, Yes, No. Contains questions 13 through 31 regarding corporate receipts, assets, and tax requirements. Includes a large watermark: 'TREASURY/IRS AND OMB USE ONLY DRAFT DO NOT FILE'.

Schedule L Balance Sheets per Books		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
Assets					
1	Cash				
2a	Trade notes and accounts receivable				
b	Less allowance for bad debts	()		()	
3	Inventories				
4	U.S. government obligations				
5	Tax-exempt securities (see instructions)				
6	Other current assets (attach statement)				
7	Loans to shareholders				
8	Mortgage and real estate loans				
9	Other investments (attach statement)				
10a	Buildings and other depreciable assets				
b	Less accumulated depreciation	()		()	
11a	Depletable assets				
b	Less accumulated depletion	()		()	
12	Land (net of any amortization)				
13a	Intangible assets (amortizable only)				
b	Less accumulated amortization	()		()	
14	Other assets (attach statement)				
15	Total assets				
Liabilities and Shareholders' Equity					
16	Accounts payable				
17	Mortgages, notes, bonds payable in less than 1 year				
18	Other current liabilities (attach statement)				
19	Loans from shareholders				
20	Mortgages, notes, bonds payable in 1 year or more				
21	Other liabilities (attach statement)				
22	Capital stock: a Preferred stock				
	b Common stock				
23	Additional paid-in capital				
24	Retained earnings—Appropriated (attach statement)				
25	Retained earnings—Unappropriated				
26	Adjustments to shareholders' equity (attach statement)				
27	Less cost of treasury stock		()		()
28	Total liabilities and shareholders' equity				

Schedule M-1 Reconciliation of Income (Loss) per Books With Income per Return				
Note: The corporation may be required to file Schedule M-3. See instructions.				
1	Net income (loss) per books		7	Income recorded on books this year not included on this return (itemize):
2	Federal income tax per books			Tax-exempt interest \$ _____
3	Excess of capital losses over capital gains			_____
4	Income subject to tax not recorded on books this year (itemize): _____			_____
5	Expenses recorded on books this year not deducted on this return (itemize):		8	Deductions on this return not charged against book income this year (itemize):
a	Depreciation \$ _____		a	Depreciation \$ _____
b	Charitable contributions \$ _____		b	Charitable contributions \$ _____
c	Travel and entertainment \$ _____			_____
6	Add lines 1 through 5		9	Add lines 7 and 8
			10	Income (page 1, line 28)—line 6 less line 9

Schedule M-2 Analysis of Unappropriated Retained Earnings per Books (Schedule L, Line 25)				
1	Balance at beginning of year		5	Distributions: a Cash
2	Net income (loss) per books			b Stock
3	Other increases (itemize): _____			c Property
	_____		6	Other decreases (itemize):
	_____		7	Add lines 5 and 6
4	Add lines 1, 2, and 3		8	Balance at end of year (line 4 less line 7)

Department of the Treasury
Internal Revenue Service

Attach to your tax return.

2023

Go to www.irs.gov/Form4626 for instructions and the latest information.

Name **Maker Company US, Inc.** Employer identification number **00-000012**

- A** Is the corporation filing this form a member of a controlled group treated as a single employer under sections 59(k)(1)(D) and 52? Yes No
If "Yes," the corporation must complete Part V listing the names, EINs, and separate company financial statement income or loss for each member of the controlled group treated as a single employer taken into account in the determination of "applicable corporation" under section 59(k)(1)(D).
- B** Is the corporation filing this form a member of a foreign-parented multinational group (FPMG) within the meaning of section 59(k)(2)(B)? Yes No
If "Yes," the corporation must complete Part V listing the names, EINs, and separate company financial statement income or loss for each member of the FPMG under section 59(k)(2)(B).

Part I Applicable Corporation Determination (Report all amounts in U.S. dollars.)
If you have already determined in current or prior years you are an applicable corporation, skip Part I and continue to Part II.

	(a) First Preceding Year Ended 12 / 31 / 2021	(b) Second Preceding Year Ended 12 / 31 / 2020	(c) Third Preceding Year Ended 12 / 31 / 2019
1 Net income or loss per applicable financial statement(s) (AFS) (see instructions):			
a Consolidated net income or loss per the AFS of the corporation	(100,000,000)	2,500,000,000	1,200,000,000
b Include AFS net income or loss of other includible entities (add net income and subtract net loss)			
c Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)			
d Specified additional net income or loss item A. Reserved for future use			
e Specified additional net income or loss item B. Reserved for future use			
f AFS net income or loss of all entities in the test group before adjustments. Combine lines 1a through 1c	(100,000,000)	2,500,000,000	1,200,000,000
2 Adjustments:			
a Financial statements covering different tax years			
b Corporations that are not included on the taxpayer's consolidated return (see instructions)			
c Pro-rata share of income from controlled foreign corporations for which the corporation is a U.S. shareholder. If zero or less, enter -0- (see instructions for special rules if completing this form for a FPMG)			
d Amounts that are not effectively connected to a U.S. trade or business (see instructions for special rules if completing this form for a FPMG)	()	()	()
e Certain taxes (see instructions)	(20,000,000)	500,000,000	270,000,000
f Patronage dividends and per-unit retain allocations (cooperatives only)			
g Alaska native corporations			
h Certain credits (see instructions)			
i Mortgage servicing income			
j Tax-exempt entities (organizations subject to tax under section 511)			
k Depreciation	(50,000,000)	(300,000,000)	(200,000,000)
l Qualified wireless spectrum			
m Adjustment M—Reserved for future use			
n Adjustment N—Reserved for future use			
o Adjustment O—Reserved for future use			
p Adjustment P—Reserved for future use			
q Adjustment Q—Reserved for future use			
r Adjustment R—Reserved for future use			
s Adjustment S—Reserved for future use			
z Other (see instructions)			100,000,000
3 Specified adjustment. Reserved for future use			
4 Total adjustments. Combine lines 2a through 2z	(70,000,000)	200,000,000	170,000,000
5 AFSI. Combine lines 1f and 4	(170,000,000)	2,700,000,000	1,370,000,000
6 AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 5			3,900,000,000
7 3-year average annual AFSI (see instructions)			1,300,000,000

Part I **Applicable Corporation Determination** (Report all amounts in U.S. dollars.) *(continued)*

- 8** Is line 7 more than \$1 billion?
 Yes. Continue to line 9.
 No. STOP here and attach to your tax return.
- 9** Is the corporation a member of a FPMG within the meaning of section 59(k)(2)(B)?
 Yes. Continue to line 10.
 No. Continue to Part II.

- 10** AFSI for purposes of the \$100 million test before adjustments:
a AFSI from line 5
b Aggregation differences (see instructions)
c Total AFSI for purposes of the \$100 million test before adjustments.
 Combine lines 10a and 10b
- 11** Adjustments:
a Income not effectively connected to a U.S. trade or business
b Pro-rata share of CFC net income described in section 56A(c)(3)
 (attach worksheet) (see instructions)
c Reserved for future use—Other adjustments 1
d Reserved for future use—Other adjustments 2
- 12** Total adjustments. Combine lines 11a and 11b
- 13** Total AFSI for purposes of the \$100 million test. Combine lines
 10c and 12 of columns (a), (b), and (c)
- 14** AFSI of first, second, and third preceding tax years. Combine columns (a), (b), and (c) of line 13
- 15** 3-year average annual AFSI for purposes of the \$100 million test
- 16** Is line 15 \$100 million or more?
 Yes. Continue to Part II.
 No. STOP here. Attach to your tax return.

	(a) First Preceding Year Ended <small>12 / 31 / 2021</small>	(b) Second Preceding Year Ended <small>12 / 31 / 2020</small>	(c) Third Preceding Year Ended <small>12 / 31 / 2019</small>
10a	(170,000,000)	2,700,000,000	1,370,000,000
10b			
10c	(70,000,000)	2,700,000,000	1,370,000,000
11a	150,000,000	(2,000,000,000)	(1,000,000,000)
11b			
11c			
11d			
12	150,000,000	(2,000,000,000)	(1,000,000,000)
13	(20,000,000)	700,000,000	370,000,000
14			1,050,000,000
15			350,000,000

DO NOT FILE

Part II Corporate Alternative Minimum Tax

1	Net income or loss per applicable financial statement(s) (AFS) (see instructions):		
a	Consolidated net income or loss per the AFS of the corporation	1a	450,000,000
b	Include AFS net income or loss of other includible entities (add net income and subtract net loss)	1b	
c	Exclude AFS net income or loss of excludible entities (add net loss and subtract net income)	1c	
d	Specified additional net income or loss item C. Reserved for future use	1d	
e	Specified additional net income or loss item D. Reserved for future use	1e	
f	AFS net income or loss before adjustments. Combine lines 1a through 1c	1f	450,000,000
2	Adjustments:		
a	Financial statements covering different tax years	2a	
b	Reserved for future use—Adjustment 2b	2b	
c	Corporations that are not included on the taxpayer's consolidated return (see instructions)	2c	
d	The corporation's distributive share of adjusted financial statement income of partnerships	2d	
e	Pro-rata share of income from controlled foreign corporations for which the corporation is a U.S. shareholder. If zero or less, enter -0-. (See instructions)	2e	
f	Amounts that are not effectively connected to a U.S. trade or business	2f	
g	Certain taxes. Enter the amount from Part III, line 7	2g	80,000,000
h	Patronage dividends and per-unit retain allocations (cooperatives only)	2h	
i	Alaska native corporations	2i	
j	Certain credits (see instructions)	2j	
k	Mortgage servicing income	2k	
l	Covered benefit plans described in section 56A(c)(11)(B)	2l	
m	Tax-exempt entities (organizations subject to tax under section 511)	2m	
n	Depreciation	2n	(100,000,000)
o	Qualified wireless spectrum	2o	
p	AFSI adjustment P—Reserved for future use	2p	
q	AFSI adjustment Q—Reserved for future use	2q	
r	AFSI adjustment R—Reserved for future use	2r	
s	AFSI adjustment S—Reserved for future use	2s	
t	AFSI adjustment T—Reserved for future use	2t	
u	AFSI adjustment U—Reserved for future use	2u	
z	Other (see instructions)	2z	
3	Total adjustments. Combine lines 2a through 2z	3	(20,000,000)
4	AFSI before financial statement net operating loss carryover. Combine lines 1f and 3	4	430,000,000
5	Financial statement net operating loss (FSNOL) (see instructions)	5	
6	AFSI. Subtract line 5 from line 4. If zero or less, enter -0-	6	430,000,000
7	Multiply line 6 by 15% (0.15)	7	64,500,000
8	Alternative minimum tax foreign tax credit (AMTFTC). Enter amount from Part IV, Section I, line 6 (see instructions)	8	
9	Tentative minimum tax. Subtract line 8 from line 7. If zero or less, enter -0-	9	64,500,000
10	Regular tax liability (see instructions)	10	42,000,000
11	Base erosion minimum tax (see instructions)	11	
12	Combine lines 10 and 11	12	42,000,000
13	Alternative minimum tax. Subtract line 12 from line 9. If zero or less, enter -0-. Enter here and on Form 1120, Schedule J, line 3, or the appropriate line of the corporation's income tax return	13	22,500,000

Part III Adjustment for Certain Taxes Under Section 56A(c)(5)

1	Current income tax provision—Foreign	1	50,000,000
2	Current income tax provision—Federal	2	
3	Deferred income tax provision—Foreign	3	30,000,000
4	Deferred income tax provision—Federal	4	
5	Income taxes included in equity method investment income	5	
6a	Adjustment A—Reserved for future use	6a	
b	Adjustment B—Reserved for future use	6b	
c	Adjustment C—Reserved for future use	6c	
d	Adjustment D—Reserved for future use	6d	
e	Adjustment E—Reserved for future use	6e	
f	Adjustment F—Reserved for future use	6f	
g	Adjustment G—Reserved for future use	6g	
h	Adjustment H—Reserved for future use	6h	
z	Income taxes in other places	6z	
7	Total. Combine lines 1 through 6z. Enter amount on Part II, line 2(g)	7	80,000,000

Part IV Alternative Minimum Tax—Corporations Foreign Tax Credit

Section I—AMT Foreign Tax Credit

1	Domestic corporation AMT foreign income taxes:			
a	Total foreign taxes paid or accrued as reported on Form 1118, Schedule B, Part I, 2(j)	1a		
b	Adjustment _____	1b		
c	Adjustment _____	1c		
d	Adjustment _____	1d		
e	Adjustment _____	1e		
f	Adjustment _____	1f		
g	Adjustment _____	1g		
2	Total domestic corporation AMT foreign income taxes. Combine lines 1a through 1g			2
3	Allowable controlled foreign corporation (CFC) AMT foreign income taxes:			
a	Pro-rata share of CFC AMT foreign income taxes from Part IV, Section II, line 11, column (n)	3a		
b	Carryover of excess foreign taxes (from Part IV, Section III, line 4, column (vii))	3b		
c	Total CFC AMT foreign income taxes. Add lines 3a and 3b			3c
d	Percentage specified in section 55(b)(2)(A)(i)	3d	15%	
e	Pro-rata share of CFC net income described in section 56A(c)(3) (attach worksheet) (see instructions)	3e		
f	CFC AMT foreign tax credit limitation (line 3d multiplied by line 3e)			3f
g	Allowable CFC AMT foreign income taxes (smaller of line 3c or line 3f)			3g
4	AMTFTC Line 4—Reserved for future use			4
5	AMTFTC Line 5—Reserved for future use			5
6	Total AMT foreign income taxes. Combine lines 2 and 3g. Enter this amount on Part II, line 8			6

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Part IV Alternative Minimum Tax—Corporations Foreign Tax Credit *(continued)*

Section II—Allowable CFC AMT Foreign Income Taxes

	(a) Name of CFC	(b) EIN or Reference ID Number of CFC	(c) CFC income	(d) Foreign taxes for which credit is allowed	(e) Adjustment	(f) Adjustment
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						

11 Total. Combine lines 1 through 10

	(g) Adjustment	(h) Adjustment	(i) Adjustment	(j) Adjustment	(k) Adjustment	(l) Total (combine columns (d) through (k))	(m) Pro-rata share percentage	(n) Pro-rata share of CFC AMT foreign income taxes (multiply column (l) by column (m))
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								

Part IV Alternative Minimum Tax—Corporations Foreign Tax Credit *(continued)*

Section III—AMT Foreign Tax Credit Carryover for Controlled Foreign Corporations (Report all amounts in U.S. dollars.)

Foreign Tax Carryover Reconciliation		(i) 5th Preceding Tax Year	(ii) 4th Preceding Tax Year	(iii) 3rd Preceding Tax Year	(iv) 2nd Preceding Tax Year	(v) 1st Preceding Tax Year	(vi) Current Tax Year	(vii) Total (add columns (i) through (vi))
1	Foreign tax carryover from the prior tax year (enter amounts from the appropriate columns of line 8 of the prior year Form 4626, Part IV, Section III (see instructions))							
2	Adjustments to line 1 (enter description—see instructions):							
a								
b								
c								
d								
e								
f								
g								
3	Total. Combine lines 2a through 2g							
4	Adjusted foreign tax carryover from prior tax year (combine lines 1 and 3). If zero or less, enter -0-							
5	Foreign tax carryover used in current tax year (see instructions)	()	()	()	()	()		()
6	Foreign tax carryover expired unused in current tax year (see instructions)	()						()
7	Foreign tax carryover generated in current tax year (see instructions)							
8	Foreign tax carryover to the following tax year. Combine lines 4 through 7. If zero or less, enter -0-							

Part V Members of a Controlled Group Treated as a Single Employer and Foreign-Parented Multinational Group (FPMG) Members Taken Into Account in "Applicable Corporation" Determination

	(a) Name of member	(b) EIN of member	(c) Check if the entity is a member of a 59(k)(1)(D) group	(d) Check if the entity is a member of a 59(k)(2)(B) group	(e) EIN/FTIN of the U.S. return (if any) on which the majority of the member's income is reported	(f) Member's financial statement income/(loss)
1	Maker TopCo. Japan, Ltd. (FPMG parent)		<input type="checkbox"/>	<input checked="" type="checkbox"/>		2,000,000,000
2	Maker Company US, Inc.	00-0000012	<input type="checkbox"/>	<input checked="" type="checkbox"/>	00-0000012	400,000,000
3	Maker US Sub 1	00-0000013	<input type="checkbox"/>	<input checked="" type="checkbox"/>	00-0000012	(10,000,000)
4	Maker US Sub 2	00-0000014	<input type="checkbox"/>	<input checked="" type="checkbox"/>	00-0000012	60,000,000
5	Maker TopCo Japan's Foreign Sub 1		<input type="checkbox"/>	<input checked="" type="checkbox"/>		5,000,000
6	Maker TopCo Japan's Foreign Sub 2		<input type="checkbox"/>	<input checked="" type="checkbox"/>		100,000,000
7	Maker TopCo Japan's Foreign Sub 3		<input type="checkbox"/>	<input checked="" type="checkbox"/>		(50,000,000)
8			<input type="checkbox"/>	<input type="checkbox"/>		
9			<input type="checkbox"/>	<input type="checkbox"/>		
10			<input type="checkbox"/>	<input type="checkbox"/>		
11			<input type="checkbox"/>	<input type="checkbox"/>		
12			<input type="checkbox"/>	<input type="checkbox"/>		
13			<input type="checkbox"/>	<input type="checkbox"/>		
14			<input type="checkbox"/>	<input type="checkbox"/>		
15			<input type="checkbox"/>	<input type="checkbox"/>		
16			<input type="checkbox"/>	<input type="checkbox"/>		
17			<input type="checkbox"/>	<input type="checkbox"/>		
18			<input type="checkbox"/>	<input type="checkbox"/>		
19			<input type="checkbox"/>	<input type="checkbox"/>		
20			<input type="checkbox"/>	<input type="checkbox"/>		
21			<input type="checkbox"/>	<input type="checkbox"/>		
22			<input type="checkbox"/>	<input type="checkbox"/>		
23			<input type="checkbox"/>	<input type="checkbox"/>		
24			<input type="checkbox"/>	<input type="checkbox"/>		

TREASURY/IRS
 AND OMB USE
 ONLY DRAFT
 May 30, 2023
 DO NOT FILE