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| Form 8993 | |
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| (December 2018) | |
| Department of the Treasury Internal Revenue Service | |
| Name of person filing this re- | turn |

Section 250 Deduction for Foreign-Derived Intangible Income (FDII) and Global Intangible Low-Taxed Income (GILTI)

OMB No. 1545-0123

► Go to www.irs.gov/Form8993 for instructions and the latest information.

Attachment Sequence No. **933**

Identifying number

| Part | Determining Deduction Eligible Income (DEI) (see instructions) | | |
|---------|---|---------|----------------------------|
| 1 | Gross Income | 1 | |
| 2 | Exclusions | | |
| а | Income included under section 951(a)(1) | | |
| b | Income included under section 951A (from Form 8992, Part II, line 3) . 2b | | |
| С | Financial Services Income 2c | | |
| d | CFC Dividends | | |
| е | Domestic Oil and Gas Extraction Income | | |
| f | Foreign Branch Income | | |
| 3 | Total Exclusions (add lines 2a through 2f) | 3 | |
| 4 | Gross Income less Total Exclusions (subtract line 3 from line 1) | 4 | |
| 5 | Deductions properly allocable to the amount on line 4 | 5 | |
| 6 | Deduction Eligible Income (DEI) (subtract line 5 from line 4) | 6 | |
| Part | | | |
| 1 | DEI (from Part I, line 6, above) | 1 | |
| 2 | Deemed Tangible Income Return (10% of QBAI) | 2 | |
| 3 | Deemed Intangible Income (DII) (subtract line 2 from line 1) | 3 | |
| Part | | | |
| 1a | DEI derived from sales, leases, exchanges, or other dispositions (but | | |
| | not licenses) of property to a foreign person for a foreign use (see | | |
| _ | instructions) | - | |
| b | DEI derived from a license of property to a foreign person for a foreign | | |
| | use (see instructions) | - | |
| С | DEI derived from services provided to a person or with respect to | | |
| • | property located outside of the United States (see instructions) 1c | | |
| 2 | Foreign Derived Deduction Eligible Income (FDDEI) (add lines 1a through 1c). .< | 2 3 | |
| 3 4 | Foreign Derived Ratio (FDDEI / DEI) (divide line 2 by line 3). | 3 4 | |
| Part | | 4 | |
| 1 1 | Deemed Intangible Income (DII) (from Part II, line 3) | 1 | |
| 2 | Foreign Derived Ratio (from Part III, line 4) | 2 | |
| - 3a | FDII (multiply line 1 by line 2). | 2 3a | |
| b | Global Intangible Low-Taxed Income (GILTI) Inclusion (see instructions for line 3b) | 3b | |
| c | Total FDII and GILTI (add lines 3a and 3b) | 3c | |
| 4 | Taxable Income (see instructions for line 4) | 4 | |
| 5 | Excess FDII and GILTI over Taxable Income (subtract line 4 from line 3c). If zero or less, enter -0- | | |
| • | here and on lines 6 and 7. | 5 | |
| 6 | FDII Reduction (divide line 3a by line 3c; multiply by line 5). | 6 | |
| 7 | GILTI Reduction (subtract line 6 from line 5). | 7 | |
| 8 | FDII Deduction (see instructions for line 8). (Enter here and on Form 1120, Schedule C; see | | |
| - | instructions for information on other tax forms). | 8 | |
| 9 | GILTI Deduction (see instructions for line 9). (Enter here and on Form 1120, Schedule C; see | | |
| | instructions for information on other tax forms). | 9 | |
| For Pa | perwork Reduction Act Notice, see separate instructions. Cat. No. 37817J | | Form 8993 (12-2018) |