

Caution: DRAFT—NOT FOR FILING

This is an early release draft of an IRS tax form, instructions, or publication, which the IRS is providing for your information as a courtesy. **Do not file draft forms.** Also, do **not** rely on draft forms, instructions, and publications for filing. We generally do not release drafts of forms until we believe we have incorporated all changes. However, unexpected issues sometimes arise, or legislation is passed, necessitating a change to a draft form. In addition, forms generally are subject to OMB approval before they can be officially released. Drafts of instructions and publications usually have at least some changes before being officially released.

Early release drafts are at <u>IRS.gov/DraftForms</u>, and may remain there even after the final release is posted at <u>IRS.gov/DownloadForms</u>. All information about all forms, instructions, and pubs is at <u>IRS.gov/Forms</u>.

Almost every form and publication also has its own page on IRS.gov. For example, the Form 1040 page is at IRS.gov/Form1040; the Publication 17 page is at IRS.gov/Pub17; the Form W-4 page is at IRS.gov/W4; and the Schedule A (Form 1040) page is at IRS.gov/ScheduleA. If typing in a link above instead of clicking on it, be sure to type the link into the address bar of your browser, not in a Search box. Note that these are friendly shortcut links that will automatically go to the actual link for the page.

If you wish, you can submit comments about draft or final forms, instructions, or publications at IRS.gov/FormsComments. We cannot respond to all comments due to the high volume we receive. Please note that we may not be able to consider many suggestions until the subsequent revision of the product.

(WORKSHEET)

Installment Payments of Section 1446 Tax for Partnerships

For calendar year 2019, or tax year beginning

► Go to www.irs.gov/Form8804W for instructions and the latest information.

ear 2019, or tax year beginning	, 2019, ending	, 20
(Keep for the partnership's records—	Do not send to the Internal Revenue	Service.)

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

Part						
1	Allocable share of effectively connect					
	expected for the tax year for all fore					
а	Total ECTI allocable to corporate pa		1a			
b	Reduction to line 1a for state and lo					
-	1.1446-6(c)(1)(iii)			$\overline{}$)	
С	Reduction to line 1a for certified foreign partr)	
d	Combine lines 1a, 1b, and 1c				. 1d	
е	Total ECTI allocable to non-corporate pa			10		
f	Reduction to line 1e for state and local taxes)	
g	Reduction to line 1e for certified foreign partr		8804-C 1g)	
h					. <u>1h</u>	
i	28% rate gain (non-corporate partners)					
j	Reduction to line 1i for state and local taxes)	
k	Reduction to line 1i for certified foreign partn)	
ı	Combine lines 1i, 1j, and 1k				. 11	
m	Unrecaptured section 1250 gain (no				_	
n	Reduction to line 1m for state and local taxes	•		1)	
0	Reduction to line 1m for certified foreign parti	•		()	
р	Combine lines 1m, 1n, and 1o				. 1p	
q	Adjusted net capital gain (including	-	I			
	section 1231 gain) (non-corporate p				_	
r	Reduction to line 1q for state and local taxes			(_)	
s	Reduction to line 1q for certified for	= -	I	,		
	S			,)	
t	Combine lines 1q, 1r, and 1s				. 1t	
2	Multiply line 1d by 21% (0.21)					
3	Multiply line 1h by 37% (0.37)					
4	Multiply line 1I by 28% (0.28)					
5	Multiply line 1p by 25% (0.25)					
6	Multiply line 1t by 20% (0.20)					
7	Add lines 2 through 6					
	required to make estimated tax pays		man \$500,	the partnership is no),	
8	Enter the total section 1446 tax	that would have been du	e for 2018	, without regard t	o	
	reductions for certified foreign partner-level items or state and local taxes under Regulations					
	section 1.1446-6(c)(1)(iii), on ECTI al	locable to all foreign partners	for 2018 .		. 8	
	Caution: This line 8 amount only ap	plies if certain conditions are	met. See ins	tructions.		
9	Enter the smaller of line 7 or line 8	•	•	e 8 amount does no	ot	
	apply, enter the amount from line 7				. 9	
	Caution: If, for any installment pay					
	qualify for the prior year safe harbor		<u> </u>		+). See ir	
40	handallaranda dan datan Ora	(a)	(b)	(c)		(d)
10	Installment due dates. See instructions					
		10				
11	Enter 25% (0.25) of line 9 in					
	columns (a) through (d). If the					
	partnership uses the annualized					
	income installment method or the					
	adjusted seasonal installment method, then enter the amount					
	from line 43	44				
12	Enter certain amounts paid or credited	11				
14	· ·	10				
13	for each period. See instructions Balance due. Subtract line 12	12				
13	from line 11	12				
D-	nominie II	13				Form 8804-W (2010)

Part II Adjusted Seasonal Installment Method (see instructions)

(Use this method only if the base period percentage for any 6 consecutive months is at least 70%.)

	(Use this method only if the base period percentage for	or an				
			(a)	(b)	(c)	(d)
			First 3 months	First 5 months	First 8 months	First 11 months
14	Enter ECTI allocable to all foreign partners for the following periods.					
а	Tax year beginning in 2016	14a				
	Tax year beginning in 2017	14b				
	Tax year beginning in 2018	14c				
15	Enter ECTI allocable to all foreign partners for each period for					
	the tax year beginning in 2019. See instructions for the					
	treatment of extraordinary items.	15				
			First 4	First 6	First 9	- ··
		_	months	months	months	Entire year
16	Enter ECTI allocable to all foreign partners for the following periods.	7				
а	Tax year beginning in 2016	16a				
a	Tax year beginning in 2017	16b				
	Tax year beginning in 2018	16c				
17	Divide the amount in each column on line 14a by the amount					
	in column (d) on line 16a.	17				
18	Divide the amount in each column on line 14b by the amount					
	in column (d) on line 16b.	18				
19	Divide the amount in each column on line 14c by the amount					
	in column (d) on line 16c.	19				
20	Add lines 17 through 19.	20				
21	Divide line 20 by 3.0.	21				
22a	Divide line 15 by line 21.	22a				
b	Extraordinary items (see instructions).	22b				
С	Combine lines 22a and 22b.	22c				
23	Reduction to line 22c amount for state and local taxes under					
	Regulations section 1.1446-6(c)(1)(iii) and for certified foreign partner-					
	level items submitted using Form 8804-C. See instructions.	23				
24	Subtract line 23 from line 22c. If zero or less, enter -0	24				
25a	Multiply the ECTI on line 24 allocable to non-corporate					
	partners by 37% (0.37).	25a				
b	Multiply the ECTI on line 24 allocable to corporate partners by					
	21% (0.21).	25b				
	Combine lines 25a and 25b.	25c				
26a	Divide the amount in columns (a) through (c) on line 16a by the amount in column (d) on line 16a.	26a				
b	Divide the amount in columns (a) through (c) on line 16b by the amount in column (d) on line 16b.	26b				
	Divide the amount in columns (a) through (c) on line 16c by the					
-	amount in column (d) on line 16c.	26c				
27	Add lines 26a through 26c.	27				
28	Divide line 27 by 3.0.	28				
29	Multiply the amount in columns (a) through (c) of line 25c by the					
	amount in the corresponding column of line 28. In column (d), enter					
	the amount from line 25c, column (d). See line 37 for instructions.	29				
				•	Form	8804-W (2019)

Annualized Income Installment Method (see instructions) Part III (b) (d) (a) (c) First First First First months 30 Annualization periods (see instructions). 30 months months months 31 Enter ECTI allocable to all foreign partners for each annualization period. See instructions for the treatment of extraordinary items. Total ECTI allocable to corporate partners. 31a Total ECTI allocable to non-corporate partners other than on lines 31c, 31d, and 31e. 31b 28% rate gain (non-corporate partners only). 31c Unrecaptured section 1250 gain (non-corporate partners only). 31d Adjusted net capital gain (including qualified dividend income and net section 1231 gain) (non-corporate partners only). 31e Annualization amounts (see instructions). 32 32 33 Annualized allocable share of ECTI for all foreign partners. See instructions for the treatment of extraordinary items, and for rules regarding the reductions for state and local taxes and certified foreign partner-level items: 33 Total ECTI allocable to corporate partners (multiply line 31a by line 32). 33a Reduction to line 33a for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). 33b Reduction to line 33a for certified foreign partner-level items submitted using Form 8804-C. 33c Combine lines 33a, 33b, and 33c. 33d Total ECTI allocable to non-corporate partners other than on lines 31i, 31m, and 31q (multiply line 31b by line 32). 33e Reduction to line 33e for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). 33f Reduction to line 33e for certified foreign partner-level items submitted using Form 8804-C. 33g Combine lines 33e, 33f, and 33g. 33h 28% rate gain allocable to non-corporate partners (multiply line 31c by line 32). 33i Reduction to line 33i for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). 33j k Reduction to line 33i for certified foreign partner-level items submitted using Form 8804-C. 33k Combine lines 33i, 33j, and 33k. 331 m Unrecaptured section 1250 gain allocable to non-corporate partners (multiply line 31d by line 32). 33m Reduction to line 33m for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). 33n o Reduction to line 33m for certified foreign partner-level items submitted using Form 8804-C. 33o Combine lines 33m, 33n, and 33o. 33p q Adjusted net capital gain (including qualified dividend income and net section 1231 gain) allocable to non-corporate partners (multiply line 31e by line 32). 33q Reduction to line 33q for state and local taxes under Regulations section 1.1446-6(c)(1)(iii). 33r Reduction to line 33g for certified foreign partner-level items submitted using Form 8804-C. 33s Combine lines 33q, 33r, and 33s. 33t Figure the tax on line 33 amounts as follows. 34 Multiply line 33d by 21% (0.21). 34a Multiply line 33h by 37% (0.37). 34b Multiply line 33l by 28% (0.28). 34c Multiply line 33p by 25% (0.25). 34d Multiply line 33t by 20% (0.20). 34e Add lines 34a through 34e. 34f 35 Applicable percentage. 35 36 Multiply line 34f by line 35. See line 37 for instructions.

Form 8804-W (WORKSHEET) 2019 Page **4**

Part	IV Required Installments Under Part II and/or Part III					
			(a)	(b)	(c)	(d)
	Note: Complete lines 37 through 43 of one column before		1st	2nd	3rd	4th
	completing the next column.		installment	installment	installment	installment
37	If only Part II or Part III is completed, enter the amount in each column from line 29 or line 36. If both parts are completed, enter					
	the smaller of the amounts in each column from line 29 or line 36.	37				
38	Add the amounts in all preceding columns of line 43. See instructions.	38				
39	Adjusted seasonal or annualized income installments.					
	Subtract line 38 from line 37. If zero or less, enter -0	39				
40	Enter 25% (0.25) of line 7 in each column.	40				
41	Subtract line 43 of the preceding column from line 42 of the					
	preceding column.	41				
42	Add lines 40 and 41.	42			34	
43	Required installments. Enter the smaller of line 39 or line 42					
	here and on line 11.	43				

Form **8804-W** (2019)

DO NOT FILE