

EXPAT
TAX TOOLS

TAX YEAR ENDED DECEMBER 31, 2025

§962 Election

PREPARED FOR

Justin Case

PREPARED • JUNE 25, 2026

§962 Election Statement

Taxpayer's Social Security Number 123-45-6789	Taxpayer's Name Justin Case
Taxpayer's Address 1 Misn Street, Las Vegas, NV 70890, United States	

Election

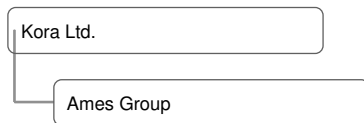
Under Internal Revenue Code §962, the taxpayer hereby elects to have the §951(a) inclusions from the controlled foreign corporation(s) listed below taxed at the corporate rates under §11 for the tax year shown above. Information required by §1.962-2(b) is provided below.

Reg. §1.962-2(b)(1): U.S. Shareholder Status and Related Entities in a Chain of Ownership for a CFC

The names, addresses, and taxable years of entities related to the controlled foreign corporations identified above, in a chain of ownership described in IRC §958(a), are:

Corporation Name	Reference Id	Ownership %	Year-End	Address
Kora Ltd.	KORA012	100.00	03/30/2025	67 North Bridge, Edinburgh, EH1 1SB, United Kingdom
Ames Group	AMES012	100.00	03/30/2025	67 North Bridge, Edinburgh, EH1 1SB, United Kingdom

Related Entities in the Chain of Ownership Described in IRC §958(a)



Reg. §1.962-2(b)(1): Chain of ownership

Reg. §1.962-2(b)(2): Gross Income Inclusions under §951(a)

Reference Id	Subpart F	§951A	§956
KORA012	190.00	1,425.00	570.00
AMES012	0.00	120.00	0.00

Reg. §1.962-2(b)(3): Total Earnings and Profits by CFC

Reference Id	Total E&P	Taxpayer Pro-rata Share
KORA012	5,000.00	5,000.00
AMES012	0.00	0.00

Taxpayer's Social Security Number	Taxpayer's Name
Justin Case	123-45-6789

Reg. §1.962-2(b)(3): Total Foreign Taxes Paid on Earning Profits by CFC

Reference Id	Foreign Taxes Paid	Pro-rata Share
KORA012	250.00	250.00
AMES012	0.00	0.00

Reg. §1.962-2(b)(4): Distributions of IRC §962 Earnings and Profits

Reference Id	Total Distribution	Excludable	Includable
KORA012	0.00	4,500.00	(4,500.00)
AMES012	0.00	0.00	0.00

Distributions of IRC §962 Earnings and Profits Details

Reference Id	Tax Year	Description	Total Distribution	Excludable	Includable
KORA012	2024	962 E&P	5,000.00	4,500.00	500.00
AMES012	2024	962 E&P	0.00	0.00	0.00

Reg. §1.962-2(b)(5): Other Required Information

Tax Liability Calculation for IRC §78, 951(a) Inclusions:

Reference Id	Subpart F	§951A	§956	Subtotal	§78 Gross Up	§250 Deduction	Taxable Income
KORA012	190.00	1,425.00	570.00	2,185.00	115.00	(750.00)	1,550.00
AMES012	0.00	120.00	0.00	120.00	0.00	(60.00)	60.00

Taxable Income	1,610.00 USD
Tax (21%)	338.10 USD
Foreign Tax Credit	(100.00) USD
Net Tax to Form 1040	238.10 USD

Foreign Tax Credit—Corporations

Attach to the corporation's tax return.

Go to www.irs.gov/Form1118 for instructions and the latest information.

OMB No. 1545-0123

Attachment
 Sequence No. **118**

For calendar year 20 25, or other tax year beginning _____, 20____, and ending _____, 20____

Name of corporation

Justin Case - 962 Election

Employer identification number

123-45-6789

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) PAS
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions)
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions)

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

A	1(a). EIN or Reference ID Number (see instructions)	1(b). Code*	2. Foreign Country or U.S. Territory (enter two-letter code—use a separate line for each) (see instructions)	Gross Income or (Loss) From Sources Outside the United States			4. Dividends (see instructions)	5. Interest
				3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)				
				(a) Exclude Gross-Up	(b) Gross-Up (section 78)			
	KORA012		UK	285.00	15.00			
A				285.00	15.00			
B								
C								
Totals				285.00	15.00			

A	6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Currency Gain	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
B							
C							
Totals						300.00	

13. Allocable Deductions							
A	(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		(f) Expenses Allocable to Sales Income	(g) Expenses Allocable to Gross Income From Performance of Services
				(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses		
A							
B							
C							
Totals							

13. Allocable Deductions (continued)				14. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part I, column (b); Part II, column (f); and Part III, column (g))	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
A	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other Allocable Deductions (attach schedule) (see instructions)				
A							300.00
B							
C							
Totals							300.00

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 951A, and reattribution of income by reason of disregarded payments, use a single line and enter the applicable code in column 1(b) (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I – Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one):		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)						
<input checked="" type="checkbox"/> Paid <input type="checkbox"/> Accrued		Tax Withheld at Source on:						
Date Paid	Date Accrued	(a) Dividends	(b)(1) Distributions of Previously Taxed Earnings and Profits	(b)(2) PTEP Group (see instructions)	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
A	12/31/2025							
B								
C								
Totals (add lines A through C)								

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:			(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
(g) Sales	(h) Services Income	(i) Other		
A				15.00
B				
C				
Totals				15.00

Part II – Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	1a		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)	1b		
2	Total taxes deemed paid (total from Part I, column 3)	2	15.00	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I)	3	()	
4	Taxes reclassified under high-tax kickout	4		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year	5		
6	Total foreign taxes (combine lines 1a through 5)	6		15.00
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 17 of the applicable Schedule A	7		300.00
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	8a	1,610.00	
b	Adjustments to line 8a (see instructions)	8b		
c	Subtract line 8b from line 8a	8c		1,610.00
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1	9		0.186335
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)	10		338.10
11	Multiply line 9 by line 10	11		63.00
12	Increase in limitation (section 960(c))	12		
13	Credit limitation (add lines 11 and 12) (see instructions)	13		63.00
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III	14		15.00

Foreign Tax Credit—Corporations

Attach to the corporation's tax return.

Go to www.irs.gov/Form1118 for instructions and the latest information.

OMB No. 1545-0123

Attachment
Sequence No. **118**

For calendar year 20 25, or other tax year beginning _____, 20____, and ending _____, 20____

Name of corporation

Justin Case - 962 Election

Employer identification number

123-45-6789

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) 951A
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) _____
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) _____

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

1(a). EIN or Reference ID Number (see instructions)	1(b). Code*	2. Foreign Country or U.S. Territory (enter two-letter code—use a separate line for each) (see instructions)	Gross Income or (Loss) From Sources Outside the United States			
			3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)		4. Dividends (see instructions)	5. Interest
			(a) Exclude Gross-Up	(b) Gross-Up (section 78)		
A	KORA012	UK	1,425.00	75.00		
B	AMES012	UK	120.00	0.00		
C						
Totals (add lines A through C)			1,545.00	75.00		

6. Gross Rents, Royalties, and License Fees	7. Sales	8. Gross Income From Performance of Services	9. Currency Gain	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
A						1,500.00
B						120.00
C						
Totals						1,620.00

13. Allocable Deductions						
(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		(f) Expenses Allocable to Sales Income	(g) Expenses Allocable to Gross Income From Performance of Services
			(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses		
A			750.00			
B			60.00			
C						
Totals			810.00			

13. Allocable Deductions (continued)				14. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part I, column (b); Part II, column (f); and Part III, column (g))	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)
(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other Allocable Deductions (attach schedule) (see instructions)	(k) Total Allocable Deductions (add columns 13(a) through 13(h) and 13(j))				
A			750.00			750.00	750.00
B			60.00			60.00	60.00
C							
Totals				810.00		810.00	810.00

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 951A, and reattribution of income by reason of disregarded payments, use a single line and enter the applicable code in column 1(b) (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I – Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one):		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)						
<input checked="" type="checkbox"/> Paid <input type="checkbox"/> Accrued		Tax Withheld at Source on:						
Date Paid	Date Accrued	(a) Dividends	(b)(1) Distributions of Previously Taxed Earnings and Profits	(b)(2) PTEP Group (see instructions)	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
A	12/31/2025							
B	12/31/2025							
C								
Totals (add lines A through C)								

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:			(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
(g) Sales	(h) Services Income	(i) Other		
A				60.00
B				0.00
C				
Totals				60.00

Part II – Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	1a		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)	1b		
2	Total taxes deemed paid (total from Part I, column 3)	2	60.00	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I)	3	()	
4	Taxes reclassified under high-tax kickout	4		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year	5		
6	Total foreign taxes (combine lines 1a through 5)	6		60.00
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 17 of the applicable Schedule A	7		810.00
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	8a	1,610.00	
b	Adjustments to line 8a (see instructions)	8b		
c	Subtract line 8b from line 8a	8c		1,610.00
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1	9		0.503106
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)	10		338.10
11	Multiply line 9 by line 10	11		170.10
12	Increase in limitation (section 960(c))	12		
13	Credit limitation (add lines 11 and 12) (see instructions)	13		170.10
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III	14		60.00

Schedule D Tax Deemed Paid With Respect to Section 951A Income by Domestic Corporation Filing the Return (Section 960(d))

Use this schedule to figure the tax deemed paid by the corporation with respect to section 951A inclusions of earnings from foreign corporations under section 960(d).

Part I—Foreign Corporation’s Tested Income and Foreign Taxes

1a. Name of Foreign Corporation		1b. EIN or Reference ID Number of the Foreign Corporation (see instructions)	2. Tax Year End (Year/Month) (see instructions)	3. Country of Incorporation (enter country code—see instructions)	4. Functional Currency of Foreign Corporation (enter code)
Kora Ltd.		KORA012	12/2025	UK	GBP
Ames Group		AMES012	12/2025	UK	GBP
5. Pro Rata Share of CFC’s Tested Income From Applicable Form 8992 Schedule (see instructions)	6. CFC’s Tested Income From Applicable Form 8992 Schedule (see instructions)	7. Divide Column 5 by Column 6	8. CFC’s Tested Foreign Income Taxes From Schedule Q (Form 5471) (see instructions)	9. Pro Rata Share of Tested Foreign Income Taxes Paid or Accrued by CFC (multiply column 7 by column 8)	
400.00	400.00	1.0000	75.00	75.00	
0.00	0.00	0.0000	75.00	0.00	
400.00	Total (add amounts in column 5)			Total (add amounts in column 9)	
				150.00	

Part II—Foreign Income Tax Deemed Paid

1. Global Intangible Low-Taxed Income (section 951A inclusion)	2. Inclusion Percentage. Divide Part II, Column 1, by Part I, Column 5 Total	3. Multiply Part I, Column 9 Total, by Part II, Column 2 Percentage	4. Tax Deemed Paid (Multiply Part II, column 3, by 80% (0.80). Enter the result here and include on the line of Schedule B, Part I, column 3, that corresponds with the line with “951A” in column 2 of Schedule A.)
1,545.00	3.8625	579.38	463.50
1,545.00	3.8625	579.38	463.50

Foreign Tax Credit—Corporations

Attach to the corporation's tax return.

Go to www.irs.gov/Form1118 for instructions and the latest information.

OMB No. 1545-0123

Attachment
 Sequence No. **118**

For calendar year 20 25, or other tax year beginning _____, 20____, and ending _____, 20____

Name of corporation

Justin Case - 962 Election

Employer identification number

123-45-6789

Use a separate Form 1118 for each applicable category of income (see instructions).

- a Separate Category (Enter code—see instructions.) _____ GEN
- b If code 901j is entered on line a, enter the country code for the sanctioned country (see instructions) _____
- c If one of the RBT codes is entered on line a, enter the country code for the treaty country (see instructions) _____

Schedule A Income or (Loss) Before Adjustments (Report all amounts in U.S. dollars. See Specific Instructions.)

A	B	C	1(a). EIN or Reference ID Number (see instructions)	1(b). Code*	2. Foreign Country or U.S. Territory (enter two-letter code—use a separate line for each) (see instructions)	3. Inclusions Under Sections 951(a)(1) and 951A (see instructions)				4. Dividends (see instructions)	5. Interest					
						Gross Income or (Loss) From Sources Outside the United States		6. Gross Rents, Royalties, and License Fees	7. Sales			8. Gross Income From Performance of Services	9. Currency Gain	10. Currency Gain Code (see instructions)	11. Other (attach schedule)	12. Total (add columns 3(a) through 9 and 11)
						(a) Exclude Gross-Up	(b) Gross-Up (section 78)									
			<u>KORA012</u>		<u>UK</u>	<u>475.00</u>	<u>25.00</u>									
Totals (add lines A through C)						<u>475.00</u>	<u>25.00</u>									
13. Allocable Deductions																
A	B	C	(a) Dividends Received Deduction (see instructions)	(b) Deduction Allowed Under Section 250(a)(1)(A)—Foreign Derived Intangible Income	(c) Deduction Allowed Under Section 250(a)(1)(B)—Global Intangible Low-Taxed Income	Rental, Royalty, and Licensing Expenses		(f) Expenses Allocable to Sales Income	(g) Expenses Allocable to Gross Income From Performance of Services							
						(d) Depreciation, Depletion, and Amortization	(e) Other Allocable Expenses									
Totals																
13. Allocable Deductions (continued)																
A	B	C	(h) Currency Loss	(i) Currency Loss Code (see instructions)	(j) Other Allocable Deductions (attach schedule) (see instructions)	(k) Total Allocable Deductions (add columns 13(a) through 13(j))	14. Apportioned Share of Deductions (enter amount from applicable line of Schedule H, Part I, column (b); Part II, column (f); and Part III, column (g))	15. Net Operating Loss Deduction	16. Total Deductions (add columns 13(k) through 15)	17. Total Income or (Loss) Before Adjustments (subtract column 16 from column 12)						
										<u>500.00</u>						
Totals											<u>500.00</u>					

*For section 863(b) income, NOLs, income from RICs, high-taxed income, section 951A, and reattribution of income by reason of disregarded payments, use a single line and enter the applicable code in column 1(b) (see instructions). Also, for reporting branches that are QBUs, use a separate line for each such branch.

Schedule B Foreign Tax Credit (Report all foreign tax amounts in U.S. dollars.)

Part I – Foreign Taxes Paid, Accrued, and Deemed Paid (see instructions)

1. Credit Is Claimed for Taxes (check one):		2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used)						
<input checked="" type="checkbox"/> Paid <input type="checkbox"/> Accrued		Tax Withheld at Source on:						
Date Paid	Date Accrued	(a) Dividends	(b)(1) Distributions of Previously Taxed Earnings and Profits	(b)(2) PTEP Group (see instructions)	(c) Branch Remittances	(d) Interest	(e) Rents, Royalties, and License Fees	(f) Other
A	12/31/2025							
B								
C								
Totals (add lines A through C)								

2. Foreign Taxes Paid or Accrued (attach schedule showing amounts in foreign currency and conversion rate(s) used) (continued)				3. Tax Deemed Paid (see instructions)
Other Foreign Taxes Paid or Accrued on:			(j) Total Foreign Taxes Paid or Accrued (add columns 2(a) through 2(i))	
(g) Sales	(h) Services Income	(i) Other		
A				25.00
B				
C				
Totals				25.00

Part II – Separate Foreign Tax Credit (Complete a separate Part II for each applicable category of income.)

1a	Total foreign taxes paid or accrued (total from Part I, column 2(j))	1a		
b	Foreign taxes paid or accrued by the corporation during prior tax years that were suspended due to the rules of section 909 and for which the related income is taken into account by the corporation during the current tax year (see instructions)	1b		
2	Total taxes deemed paid (total from Part I, column 3)	2	25.00	
3	Reductions of taxes paid, accrued, or deemed paid (enter total from Schedule G, Part I)	3	()	
4	Taxes reclassified under high-tax kickout	4		
5	Enter the sum of any carryover of foreign taxes (from Schedule K, line 3, column (xiv), and from Schedule I, Part III, line 3) plus any carrybacks to the current tax year	5		
6	Total foreign taxes (combine lines 1a through 5)	6		25.00
7	Enter the amount from the applicable column of Schedule J, Part I, line 11 (see instructions). If Schedule J is not required to be completed, enter the result from the "Totals" line of column 17 of the applicable Schedule A	7		500.00
8a	Total taxable income from all sources (enter taxable income from the corporation's tax return)	8a	1,610.00	
b	Adjustments to line 8a (see instructions)	8b		
c	Subtract line 8b from line 8a	8c		1,610.00
9	Divide line 7 by line 8c. Enter the resulting fraction as a decimal (see instructions). If line 7 is greater than line 8c, enter 1	9		0.310559
10	Total U.S. income tax against which credit is allowed (regular tax liability (see section 26(b)) minus any American Samoa economic development credit)	10		338.10
11	Multiply line 9 by line 10	11		105.00
12	Increase in limitation (section 960(c))	12		
13	Credit limitation (add lines 11 and 12) (see instructions)	13		105.00
14	Separate foreign tax credit (enter the smaller of line 6 or line 13). Enter here and on the appropriate line of Part III	14		25.00

U.S. Shareholder Calculation of Global Intangible Low-Taxed Income (GILTI)

Go to www.irs.gov/Form8992 for instructions and the latest information.

Name of person filing this return Justin Case	A Identifying number 123-45-6789
Name of U.S. shareholder Justin Case - 962 Election	B Identifying number 123-45-6789

Part I Net Controlled Foreign Corporation (CFC) Tested Income				
1 Sum of Pro Rata Share of Net Tested Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (e). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (c), that pertains to the U.S. shareholder.	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">1</td> <td style="width: 65%;"></td> <td style="width: 30%; text-align: right; border: 1px solid black;">400.00</td> </tr> </table>	1		400.00
1		400.00		
2 Sum of Pro Rata Share of Net Tested Loss If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (f). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (f), that pertains to the U.S. shareholder.	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">2</td> <td style="width: 65%;"></td> <td style="width: 30%; text-align: right; border: 1px solid black;">(5,600.00)</td> </tr> </table>	2		(5,600.00)
2		(5,600.00)		
3 Net CFC Tested Income. Combine lines 1 and 2. If zero or less, stop here	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">3</td> <td style="width: 65%;"></td> <td style="width: 30%; text-align: right; border: 1px solid black;">(5,200.00)</td> </tr> </table>	3		(5,200.00)
3		(5,200.00)		

Part II Calculation of Global Intangible Low-Taxed Income (GILTI)				
1 Net CFC Tested Income. Enter amount from Part I, line 3	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">1</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	1		
1				
2 Deemed Tangible Income Return (DTIR) If the U.S. shareholder is not a member of a U.S. consolidated group, multiply the total from Schedule A (Form 8992), line 1, column (g), by 10% (0.10). If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (i), that pertains to the U.S. shareholder.	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">2</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	2		
2				
3a Sum of Pro Rata Share of Tested Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (j). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3a blank.	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">3a</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	3a		
3a				
b Sum of Pro Rata Share of Tested Interest Income If the U.S. shareholder is not a member of a U.S. consolidated group, enter the total from Schedule A (Form 8992), line 1, column (i). If the U.S. shareholder is a member of a U.S. consolidated group, leave line 3b blank.	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">3b</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	3b		
3b				
c Specified Interest Expense If the U.S. shareholder is not a member of a U.S. consolidated group, subtract line 3b from line 3a. If zero or less, enter -0-. If the U.S. shareholder is a member of a U.S. consolidated group, enter the amount from Schedule B (Form 8992), Part II, column (m), that pertains to the U.S. shareholder.	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">3c</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	3c		
3c				
4 Net DTIR. Subtract line 3c from line 2. If zero or less, enter -0-	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">4</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	4		
4				
5 GILTI. Subtract line 4 from line 1. If zero or less, enter -0-	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 5%; border: 1px solid black; text-align: center;">5</td> <td style="width: 65%;"></td> <td style="width: 30%;"></td> </tr> </table>	5		
5				

**SCHEDULE A
(Form 8992)**

(Rev. December 2022)
Department of the Treasury
Internal Revenue Service

**Schedule of Controlled Foreign Corporation (CFC) Information To Compute
Global Intangible Low-Taxed Income (GILTI)**

Go to www.irs.gov/Form 8992 for instructions and the latest information.

OMB No. 1545-0123

Attachment
Sequence No. **992A**

Name of person filing this schedule

Justin Case

A Identifying number

123-45-6789

Name of U.S. shareholder

Justin Case - 962 Election

B Identifying number

123-45-6789

(a) Name of CFC	(b) EIN or Reference ID	Calculations for Net Tested Income (see instructions)								GILTI Allocated to Tested Income CFCs (see instructions)	
		(c) Tested Income	(d) Tested Loss	(e) Pro Rata Share of Tested Income	(f) Pro Rata Share of Tested Loss	(g) Pro Rata Share of Qualified Business Asset Investment (QBAI)	(h) Pro Rata Share of Tested Loss QBAI Amount	(i) Pro Rata Share of Tested Interest Income	(j) Pro Rata Share of Tested Interest Expense	(k) GILTI Allocation Ratio (Divide Col. (e) by Line 1 Total)	(l) GILTI Allocated to Tested Income CFCs (Multiply Form 8992, Part II, Line 5, by Col. (k))
Kora Ltd.	KORA012	400.00	(0.00)	400.00	(0.00)		()				
Ames Group	AMES012	0.00	(5,600.00)	0.00	(5,600.00)		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
			()		()		()				
1. Totals (see instructions)		400.00	(5,600.00)	400.00	(5,600.00)		()				

Totals on line 1 should include the totals from any continuation sheets.

For Paperwork Reduction Act Notice, see Instructions for Form 8992.

Cat. No. 71396P

Schedule A (Form 8992) (Rev. 12-2022)

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

OMB No. 1545-0123

Attachment
 Sequence No. **993**

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

Name of person filing this return

Identifying number

Justin Case - 962 Election

123-45-6789

Part I Determining Deduction Eligible Income (DEI) and Deemed Intangible Income (DII) (see instructions)

1	Gross income		1
2	Exclusions:		
a	Income included under section 951(a)(1) (see instructions)	2a	
b	Income included under section 951A (see instructions)	2b	
c	Financial services income	2c	
d	CFC dividends (see instructions)	2d	
e	Domestic oil and gas extraction income	2e	
f	Foreign branch income	2f	
g	Income and gain from the sale or other disposition of intangible property under section 250(b)(3)(A)(i)(VII)(aa) (see instructions)	2g	
h	Income and gain from the sale or other disposition of certain other property under section 250(b)(3)(A)(i)(VII)(bb) (see instructions)	2h	
3	Total exclusions (add lines 2a through 2h)		3
4	Gross DEI (subtract line 3 from line 1)		4
5	Deductions properly allocable to the amount on line 4		5
6	DEI (subtract line 5 from line 4)		6
7a	Deemed tangible income return (DTIR) (10% of QBAI)	7a	
b	DTIR (10% of QBAI) from partnerships	7b	
c	Total DTIR (add lines 7a and 7b)		7c
8	DII (subtract line 7c from line 6)		8

Part II Determining Foreign-Derived Deduction Eligible Income (FDDEI) (see instructions)

	(A) Foreign-derived income from all sales of general property	(B) Foreign-derived income from all sales of intangible property	(C) Foreign-derived income from all services	(D) Total (add columns (A) through (C))
9a	Gross receipts			9a
b	Gross receipts from partnerships			9b
c	Total gross receipts (add lines 9a and 9b)			9c
10a	Cost of goods sold (COGS) (see instructions)			10a
b	COGS from partnerships (see instructions)			10b
c	Total COGS (add lines 10a and 10b)			10c
11	Gross FDDEI (subtract line 10c from line 9c)			11
12	Allocable deductions			12
13	Allocable deductions from partnerships			13
14	Interest deductions			14
15	Research and experimental deductions			15
16	Other apportioned deductions			16
17	Other apportioned deductions from partnerships			17
18	Total deductions (add lines 12 through 17)			18
19	FDDEI (subtract line 18 from line 11)			19

Part III Determining FDII and/or GILTI Deduction (see instructions)

20	Foreign-derived ratio (FDDEI/DEI) (divide line 19 by line 6)	20	
21	FDII (multiply line 8 by line 20)	21	
22	GILTI inclusion (see instructions)	22	1,620.00
23	Total FDII and GILTI (add lines 21 and 22)	23	1,620.00
24	Taxable income (see instructions) (If zero or less, skip lines 25 through 27 and enter -0- on lines 28 and 29.)	24	2,420.00
25	Excess FDII and GILTI over taxable income (subtract line 24 from line 23). If zero or less, enter -0- here and on lines 26 and 27	25	
26	FDII reduction (divide line 21 by line 23; multiply by line 25)	26	
27	GILTI reduction (subtract line 26 from line 25)	27	
28	FDII deduction (see instructions). Enter here and on Form 1120, Schedule C	28	
29	GILTI deduction (see instructions). Enter here and on Form 1120, Schedule C	29	810.00

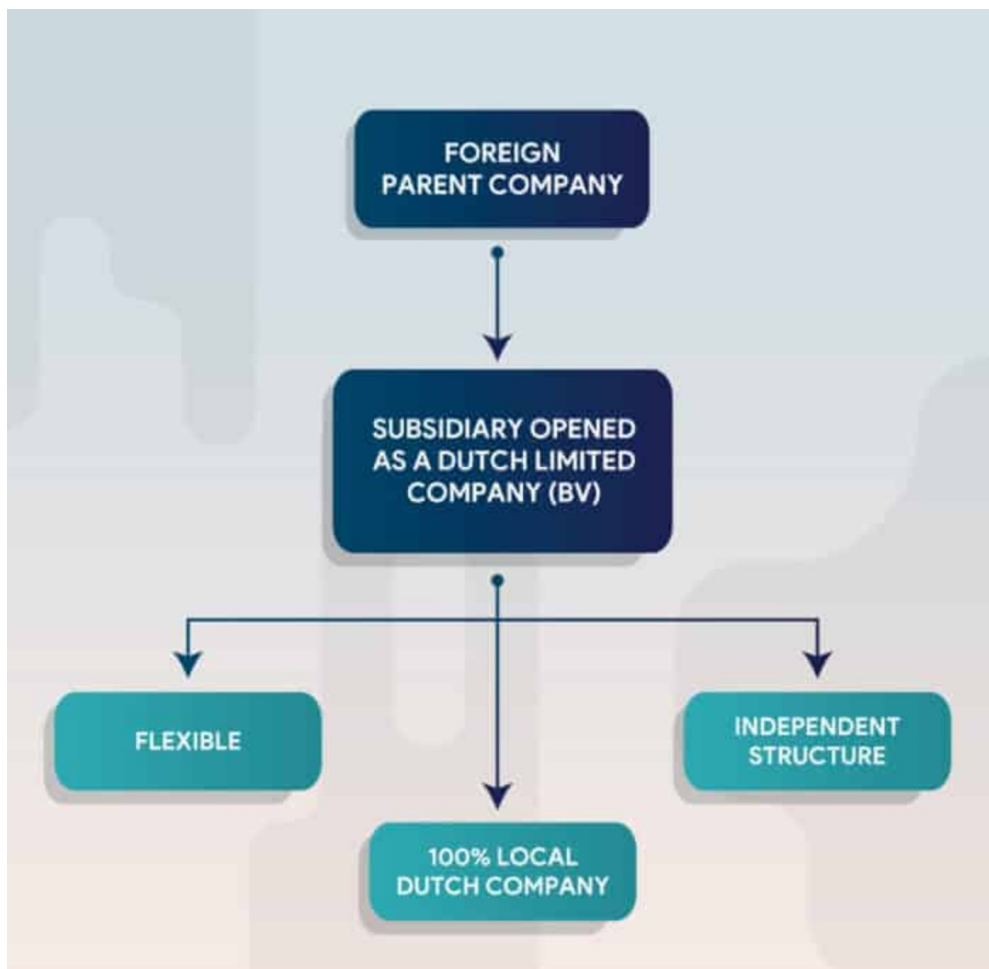
For Paperwork Reduction Act Notice, see separate instructions.

Cat. No. 37817J

Form **8993** (Rev. 12-2025) Created 9/12/25

Taxpayer's Social Security Number Justin Case	Taxpayer's Name 123-45-6789
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Organizational Chart



All amounts are in USD

	Corporation	Ownership	Total E&P	Subpart F		951A	956		Foreign Tax Paid
				Passive	General Limitation		Passive	General Limitation	
1	Kora Ltd.	100.00%	\$5,000.00	\$200.00	\$0.00	\$1,500.00	\$100.00	\$500.00	\$250.00
2	Ames Group	100.00%	\$0.00	\$0.00	\$0.00	\$120.00	\$0.00	\$0.00	\$0.00

	Subpart F		951A	956		Total 951A E&P	Pro Rata Share
	Passive	General Limitation		Passive	General Limitation		
Kora Ltd.							
PRE-TAX E&P	\$200.00	\$0.00	\$1,500.00	\$100.00	\$500.00	\$2,300.00	\$2,300.00
FOREIGN TAXES PAID	\$10.00	\$0.00	\$75.00	\$5.00	\$25.00	\$115.00	\$115.00
Ames Group							
PRE-TAX E&P	\$0.00	\$0.00	\$120.00	\$0.00	\$0.00	\$120.00	\$120.00
FOREIGN TAXES PAID	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
NET AFTER TAX INCOME	\$190.00	\$0.00	\$1,545.00	\$95.00	\$475.00	\$2,305.00	
951(a) INCLUSIONS WITH RESPECT TO CFC	\$190.00	\$0.00	\$1,545.00	\$95.00	\$475.00	\$2,305.00	
78 GROSS-UP	\$10.00	\$0.00	\$75.00	\$5.00	\$25.00	\$115.00	
DEDUCTION UNDER 250			\$810.00			\$810.00	
TAXABLE INCOME UNDER 962	\$200.00	\$0.00	\$810.00	\$100.00	\$500.00	\$1,610.00	

TOTAL TAXABLE INCOME UNDER 962	\$1,610.00
TAX UNDER 11 (CORP RATES- 21%)	\$338.10

TAX UNDER 11 (CORP RATES- 21%)	Subpart F		951A	956	
	Passive	General Limitation		Passive	General Limitation
% OF TAXABLE INCOME	12.42%	0.00%	50.31%	6.21%	31.06%
ALLOCATED TAX LIABILITY	\$42.00	\$0.00	\$170.10	\$21.00	\$105.00
TAXES DEEMED PAID	\$10.00	\$0.00	\$75.00	\$5.00	\$25.00
LESS 20% (10% FOR 2026)			\$15.00		
TAXES AVAILABLE FOR CREDIT	\$10.00	\$0.00	\$60.00	\$5.00	\$25.00
CREDIT ALLOWED- LESSER OF TAX LIABILITY OR TAX DEEMED PAID	\$10.00	\$0.00	\$60.00	\$5.00	\$25.00
Carryback / Carryover FTC	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

TAX UNDER 962	\$338.10
FTC- PASSIVE	\$15.00
FTC- 951A	\$60.00
FTC – GENERAL LIMITATION	\$25.00
NET TAX OWED	\$238.10