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Meta Platforms, Inc.,

Petitioner

v.

Commissioner of Internal Revenue

Respondent

Electronically Filed
Docket No. 16081-25
Document No. 1

Petition

SERVED 12/05/25

UNITED STATES TAX COURT

META PLATFORMS, INC. &
SUBSIDIARIES,

Petitioner,

v.

COMMISSIONER OF INTERNAL
REVENUE,

Respondent.

Docket No. _____

Filed Electronically

PETITION

Meta Platforms, Inc. (“Meta”)¹ and Subsidiaries hereby petitions for a redetermination of the deficiencies in tax for the taxable years ended December 31, 2017 (“2017”), December 31, 2018 (“2018”), and December 31, 2019 (“2019”) (collectively, the “Years at Issue”), determined by the Commissioner of the Internal Revenue Service (“Respondent”) and set forth in a Notice of Deficiency dated September 23, 2025 (the “SNOD”).

In support thereof, Meta alleges as follows:

¹ On October 28, 2021, Facebook, Inc. changed its name to Meta Platforms, Inc. This petition uses “Meta” and “Facebook” interchangeably, generally referring to Facebook when discussing the period prior to the Years at Issue.

1. **Taxpayer Information.** Meta is a corporation organized under the laws of the State of Delaware. Meta’s principal place of business is 1 Meta Way, Menlo Park, California 94025. Meta timely filed its federal income tax returns for the Years at Issue electronically.

2. **Notice of Deficiency.** On or about September 23, 2025, the Internal Revenue Service (“IRS”), whose office is in San Jose, California, mailed to Meta the SNOD upon which this petition is based. A redacted copy of the SNOD, including the statement and schedules that accompanied it, is attached to this petition.

3. **Amount in Dispute.** In the SNOD, Respondent determined deficiencies and penalties in the following amounts:

Tax Year	Deficiency: Increase in Tax	Penalty: Section 6662(i)	Total
2017	\$7,756,033,831	\$30,747,879	\$7,786,781,710
2018	\$3,916,911,219	\$27,319,514	\$3,944,230,733
2019	\$4,218,311,556		\$4,218,311,556

Meta disputes the entire SNOD, including the deficiency and penalty amounts set forth therein and reflected *supra*.

The Court’s determinations regarding the assignments of error in Paragraph 4, *infra*, will require redetermination of various correlative and computational adjustments made in the SNOD in accordance with Rule 155.²

² All Rule references are to the Tax Court Rules of Practice and Procedure.

4. Assignments of Error.

Respondent’s determination of the deficiencies and penalties for the Years at Issue, as set forth in the SNOD, is based upon the following errors:

4.a. Periodic Adjustments.

Respondent erred in increasing Meta’s income by \$20,690,603,113, \$15,116,977,863, and \$18,584,405,532 for 2017, 2018, and 2019, respectively, relating to the platform contribution transaction (“PCT”) made by Facebook, Inc. (“Facebook US”) to Facebook Ireland³ effective September 15, 2010, and subsequent PCTs (the “periodic adjustments”). In accordance with Rule 39, Respondent’s periodic adjustments are barred by collateral estoppel, estoppel, and *res judicata*. Further, Treas. Reg. § 1.482-7(i)(6) is invalid because it is contrary to sections⁴ 482 and 6501(a), does not reflect the best reading of section 482, exceeds Treasury’s rule making authority, was not the product of reasoned decision making, and was not issued in compliance with the requirements of the Administrative Procedure Act. Moreover, the periodic adjustments violate the arm’s length standard and the commensurate with income (“CWI”) mandate of section 482 and the regulations, and are otherwise inappropriate under and inconsistent with section 482

³ “Facebook Ireland” refers collectively to Facebook Ireland Holdings Unlimited (“FIH”) and Facebook Ireland Limited (“FIL”). As of September 2010, FIH and FIL were wholly owned subsidiaries of Facebook US, with FIH wholly owning FIL.

⁴ Unless otherwise noted, all section references are to the Internal Revenue Code of 1986, as amended and in effect for the Years at Issue.

and Treas. Reg. § 1.482-7(i)(6). For the foregoing reasons, Respondent's periodic adjustments are arbitrary, capricious, or unreasonable.

Respondent further erred by failing to make correlative adjustments related to the periodic adjustments, including⁵ the impact of such adjustments on Meta's section 250 deduction (*see infra* Paragraphs 4.g., 4.j., and 4.k.) and section 965 tax (*see infra* Paragraphs 4.e., 4.h., and 4.i.) for the Years at Issue.

4.b. Brazilian Withholding Tax.

Respondent erred in decreasing Meta's foreign tax credits under section 901 (including section 903 credits) by \$76,869,698, \$68,298,785, and \$91,243,485 for 2017, 2018, and 2019, respectively, (and in increasing Meta's income tax by equal amounts) relating to Meta's payment of Brazilian withholding taxes in those years. Respondent's primary position invoking the economic substance doctrine under section 7701(o) and certain anti-abuse judicial doctrines (the substance over form, conduit entity, and step transaction doctrines), and his alternative positions, including under sections 901(l), 164, and 482, are erroneous.

4.c. Section 6662 Penalties Related to Brazilian Withholding Tax.

In connection with his adjustments related to Brazilian withholding tax discussed *supra* in Paragraph 4.b., Respondent erred in asserting a 40% penalty

⁵ The term "including" in this petition is used in its ordinary, illustrative sense—to introduce examples and not provide an exhaustive list.

under section 6662(i) in the amounts of \$30,747,879 and \$27,319,514 for 2017 and 2018, respectively, and alternatively 20% penalties under sections 6662(b)(2) and 6662(b)(6). Respondent's penalty assertions are erroneous for the same reasons that his Brazilian withholding tax adjustments are erroneous as stated in Paragraph 4.b., *supra*. In addition, Meta adequately disclosed the relevant facts, including its revenues from ad sales in Brazil, the flow of funds among the relevant entities, and its claim for foreign tax credits under sections 901 and 903 for its payment of Brazilian withholding taxes. Moreover, regarding Respondent's alternative 20% penalties, Meta had substantial authority for its position.

4.d. Brazilian Withholding Tax (Alternative Minimum Tax).

Respondent erred in decreasing Meta's foreign tax credits under section 901 (including section 903 credits) by \$76,869,698 for 2017, (and in increasing Meta's income tax by an equal amount) and in asserting corresponding Alternative Minimum Tax ("AMT") adjustments for the reasons stated in Paragraph 4.b., *supra*.

4.e. Section 965 Aggregate Foreign Cash Position.

Respondent erred in increasing Meta's section 965 aggregate foreign cash position ("AFCP") by \$203,193,939 for 2017, including because Respondent erroneously disregarded a payment of \$203,193,939 (£152,102,656.64) to Meta by Facebook UK Limited ("Facebook UK"), a UK limited company wholly owned

indirectly by Meta, for Meta shares issued to Facebook UK employees during Facebook UK's taxable year ended December 31, 2017 (the "2017 SBC Payment").

4.f. Inclusion of Stock-Based Compensation Costs in Cost Sharing Pool.

Respondent erred in increasing Meta's income by \$1,545,871,426 and \$1,692,082,457 for 2017 and 2018, respectively, under section 482 by including certain stock-based compensation ("SBC") amounts in the pool of allocable intangible development costs ("IDCs") for Meta's 2010 cost sharing arrangement (the "CSA"). Respondent's income allocation is arbitrary, capricious, or unreasonable. Further, Treas. Reg. § 1.482-7(d) is invalid, including because it is contrary to the plain language and best reading of section 482 and impermissibly denies judicial review of SBC transfer pricing adjustments contrary to sections 6214 and 7422. Respondent further erred in alternatively disallowing a deduction under section 162 for these SBC amounts on the basis that they are not ordinary and necessary for Meta's trade or business. For the foregoing reasons, Respondent further erred in denying Meta's refund claim for 2019, which Meta included with its timely-filed 2019 U.S. federal income tax return, and which decreased the pool of allocable IDCs for the CSA by the SBC amount of \$1,867,203,418.

4.g. Foreign-Derived Intangible Income.

Respondent erred (i) in decreasing Meta's foreign-derived intangible income ("FDII") under section 250 by \$457,824,835 and \$1,437,682,332 for 2018 and 2019,

respectively, (ii) in decreasing Meta's corresponding deduction under section 250 (*i.e.*, the portion of the section 250 deduction attributable to FDII, or "FDII deduction") by \$171,684,313 and \$539,130,874 for 2018 and 2019, respectively, (iii) by disallowing the FDII and FDII deduction adjustments that Meta disclosed to the IRS via a "Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment" (the "Rev. Proc. 94-69 Statement"), and (iv) to the extent that his calculations fail to reflect the correlative impact resulting from his other determinations set forth in the SNOD.

4.h. Section 965(a) Inclusion.

Respondent erred (i) in decreasing Meta's section 965(a) inclusion by \$407,648,525 for 2017, (ii) by disallowing the section 965 adjustments for 2017 that Meta disclosed to the IRS, and (iii) to the extent that his section 965(a) inclusion calculations fail to reflect the correlative impact resulting from his other determinations in the SNOD.

4.i. Section 965 Deemed Paid Taxes.

Respondent erred (i) in increasing Meta's section 965 deemed paid foreign income taxes by \$4,679,012 for 2017, (ii) by disallowing the section 965 adjustments for 2017 that Meta disclosed to the IRS, and (iii) to the extent that his section 965 deemed paid foreign income tax calculations fail to reflect the correlative impact resulting from his other determinations in the SNOD.

4.j. GILTI Inclusion.

Respondent erred (i) in decreasing Meta's section 951A global intangible low-taxed income ("GILTI") inclusion by \$66,114,493 and \$20,404,062 for 2018 and 2019, respectively, (ii) by disallowing the section 951A adjustments for 2018 and 2019 that Meta disclosed to the IRS, and (iii) to the extent that his section 951A GILTI inclusion calculations fail to reflect the correlative impact resulting from his other determinations in the SNOD.

4.k. 951A GILTI Deemed Paid Taxes.

Respondent erred (i) in increasing Meta's section 951A GILTI deemed paid foreign income taxes by \$2,538,933 for 2018, (ii) in decreasing Meta's section 951A GILTI deemed paid foreign income taxes by \$13,523,400 for 2019, (iii) by disallowing the section 951A GILTI deemed paid foreign income tax adjustments for 2018 and 2019 that Meta disclosed to the IRS, and (iv) to the extent that his section 951A GILTI deemed paid taxes calculations fail to reflect the correlative impact resulting from his other determinations in the SNOD.

4.l. Research Credits.

Respondent erred in decreasing Meta's allowable research credits under section 41 by \$26,271,361, \$238,526,523, and \$201,069,883 for 2017, 2018, and 2019, respectively.

4.m. Adjustments that affect Income, Taxes and Credits, Memo Adjustments, and Computational Adjustments.

Respondent erred in all other adjustments that affect income, taxes, and credits included in the SNOD, including his memo adjustments and computational adjustments.

4.n. Adjustments from Prior Tax Years.

Respondent erred in not adjusting Meta's income for adjustments from Meta's taxable years ending December 31, 2010 ("2010") (Tax Court Docket No. 21959-16); December 31, 2011 ("2011") and December 31, 2013 ("2013") (both docketed in Tax Court Docket No. 12738-18); and December 31, 2014 ("2014"), December 31, 2015 ("2015"), and December 31, 2016 ("2016") (each currently before Respondent's Office of Appeals).

4.o. Interest Computation.

Respondent erred to the extent Respondent failed to follow section 7508A by disregarding the federally declared disaster period beginning on January 20, 2020, and continuing through July 10, 2023, in determining the amount of any interest, penalty, additional amount, or addition to tax.

5. Supporting Facts.

Meta relies on the facts described below as the basis for this proceeding. Meta also incorporates by reference into this Paragraph 5 all facts described above.

5.a. Periodic Adjustments.

Facebook's CSA and License Agreements

5.a.1. Facebook US and Facebook Ireland entered into an Agreement to Share Costs and Risks of Online Platform Intangible Property Development, effective as of September 15, 2010 (*i.e.*, the “CSA” defined *supra* in Paragraph 4.f.), relating to the hardware and software systems underlying Facebook's Online Platform (“FOP Technology”).

5.a.2. In connection with the CSA, Facebook US entered into two licenses with Facebook Ireland effective September 15, 2010: (i) a User Base and Marketing Intangible License Agreement (the “User Base and Marketing License”) in which Facebook US granted to Facebook Ireland the rights to the existing Facebook “User Base” and “Marketing Intangibles” worldwide, except in the United States and Canada (*i.e.*, in the rest-of-world territory (“ROW Territory”)); and (ii) the Online Platform Intangible Property Buy-In License Agreement (the “2010 PCT Agreement”) (collectively, the FOP Technology, User Community Rights, and Marketing Intangibles are the “CSA Contributions”).

The 2010 Litigation

5.a.3. On July 26, 2016, Respondent issued Facebook a Statutory Notice of Deficiency alleging a deficiency of tax for 2010 (the “2010 SNOD”).

5.a.4. The 2010 SNOD determined that Facebook US “transferred intangible property effective September 15, 2010 to Facebook Ireland” and reallocated income from Facebook Ireland to Facebook US based on Respondent’s determination that “[p]ursuant to Section 482, [...] the NPV of the transferred intangible property is \$13,883,630,000.”

5.a.5. On October 11, 2016, in Tax Court Docket No. 21959-16 (“Docket No. 21959-16”), Facebook timely filed a petition in this Court challenging Respondent’s adjustments set forth in the 2010 SNOD.

5.a.6. On January 15, 2020, Respondent filed his First Amendment to Answer in Docket. No. 21959-16, increasing his asserted value of the CSA Contributions under section 482 to \$21.147 billion.

5.a.7. This Court held a trial on the merits to determine the correct value of the CSA Contributions under section 482 (the “2010 Trial”). The 2010 Trial consisted of six trial sessions, the first of which began on February 18, 2020, and the last of which ended on August 26, 2022.

5.a.8. Facebook and Respondent filed their opening briefs in Docket. No. 21959-16 on November 18, 2022.

5.a.9. Facebook and Respondent filed their answering briefs in Docket. No. 21959-16 on February 17, 2023.

5.a.10. The court record for Docket. No. 21959-16 included the actual financial results for Facebook Ireland for 2010 through 2016, including Facebook Ireland's revenue, profits, intangible development costs, and royalty payments.

5.a.11. Throughout the 2010 Trial, Respondent objected to Facebook's questions about post-transaction events as irrelevant.

During the 2010 Trial, Respondent Initiated an Audit of Facebook's 2014-2016 Tax Years

5.a.12. Contemporaneous with the 2010 Trial, Respondent audited Meta's 2014, 2015, and 2016 tax years and issued information document requests ("IDRs") pursuant to which Respondent obtained Facebook Ireland's actual financial results for 2017 through 2020.

5.a.13. On July 14, 2021, Respondent issued IDRs INTL 125 and 128. The stated purpose of both was to "[r]eview information pertaining to the Agreement to Share Costs and Risks of Online platform Intangible Property Development, ("CSA") as amended, between Facebook Inc., and Facebook Ireland Holdings Unlimited, the Controlled Participants. This information will assist Exam in determining whether periodic adjustments under Treas. Reg. §1.482-7(i)(6) are applicable for tax years ended December 31, 2014 to 2016...."

5.a.14. Respondent's IDR INTL 125 requested information about the termination of the CSA. Meta replied to IDR INTL 125 on August 20,

2021, stating “[t]he Controlled Participants terminated the cost sharing agreement, effective July 1, 2020.”

5.a.15. Respondent’s IDR INTL 128 requested all documents related to the post-2016 CSA activity. Meta replied to IDR INTL 128 on August 20, 2021, providing Respondent with its section 6662(e) documentation related to the CSA activity for Meta’s tax returns for the Years at Issue. These materials contained Facebook Ireland’s actual revenue, cost of goods sold, and gross profit for each of the Years at Issue. Meta did not supply the section 6662(e) documentation for its taxable year ended December 31, 2020 (“2020”) as part of its response to IDR INTL 128 on August 20, 2021, because it had not been finalized.

5.a.16. On January 21, 2022, in response to IDR INTL 137, Meta provided Respondent with its section 6662(e) documentation related to the CSA activity prepared for Facebook’s 2020 tax return. The response to IDR INTL 137 included Facebook Ireland’s actual revenue, cost of goods sold, and gross profit for 2020.

5.a.17. On February 18, 2022, Respondent issued IDRs INTL 138 and 139. The stated purpose of both was to “assist Exam in reviewing and understanding Facebook Ireland’s divisional profits, losses and investments for the duration of the parties’ cost sharing arrangement for purposes of Treas. Reg. §1.482-7(i)(6).”

5.a.18. IDR INTL 138 requested the “payments Facebook Inc. received from Facebook Ireland Holdings Unlimited for tax years 2017, 2018, 2019, and 2020, in connection to the [2010 PCT Agreement and the User Base and Marketing License].” Meta replied to IDR INTL 138 on March 9, 2022, stating that the only payments made by FIH to Facebook US during the Years at Issue were related to the marketing intangibles royalty and providing the amounts of those payments.

5.a.19. IDR INTL 139 requested section 6662(e) documentation for Facebook US and Facebook Ireland’s data hosting services and selling, general, and administrative services for 2020. Meta replied to IDR INTL 139 on March 9, 2022, providing the requested section 6662(e) documentation.

5.a.20. Upon information and belief, Respondent’s audit team for Meta’s 2014-2016 tax years conferred with Respondent’s trial counsel for the 2010 Trial.

During the 2010 Trial, Respondent Initiated an Audit of the Years at Issue

5.a.21. Also contemporaneous with the 2010 Trial, Respondent began auditing the Years at Issue. As part of his audit for the Years at Issue, Respondent issued multiple IDRs including IDR TPP 610 on February 10, 2022, in which Respondent requested information related to Facebook Ireland’s Form 5471 for the Years at Issue, including Facebook Ireland’s trial balance. Meta replied to

IDR TPP 610 on March 3, 2022, providing Respondent with the requested information including the trial balance, Form 5471, Schedule C, and Form 5471 Schedule F information for Facebook Ireland for each of the Years at Issue.

5.a.22. Upon information and belief, Respondent’s audit team for the Years at Issue conferred with Respondent’s trial counsel for the 2010 Trial.

Respondent’s Statements During 2010 Trial Regarding Commensurate with Income

5.a.23. On January 24, 2023, during the post-opening brief hearing for the 2010 Trial, this Court asked Respondent whether “commensurate with income or [*sic*] permit[s] Treasury to make an adjustment to this transaction?”⁶

5.a.24. In reply to the Court, Respondent’s counsel stated “that’s very unlikely...because if you look at the reasoning...for the CWI thing to begin with had a lot to do with information asymmetry, the fact that taxpayers often have information about their projections and their profits that the Government doesn’t have.”⁷

5.a.25. Respondent further admitted that when there is a “full de novo Tax Court proceeding where I don’t think there’s any information asymmetry at this point...[T]he Court’s going to determine what the arm’s length price is [for the PCT]. And so all we’ll be doing in that situation with the CWI adjustment is

⁶ January 24, 2023, Trial Tr. 120:14-17, Dkt. No. 707.

⁷ January 24, 2023, Trial Tr. 120:18-24, Dkt. No. 707.

making the adjustment that allows us to adjust for how the risks actually played out.

And that’s not what CWI is for....”⁸

The Court Determined Under Section 482 the Value of the FOP Technology, User Community Rights, and Marketing Intangibles

5.a.26. On May 22, 2025, the Court issued an opinion regarding the 2010 SNOD in *Facebook, Inc. v. Commissioner*, 164 T.C. No. 9 (2025) (the “Opinion”). The Court held that under section 482 the value of the CSA Contributions was approximately \$7.8 billion (subject to further calculations pursuant to Rule 155) based on its application of the income method set forth in Treas. Reg. § 1.482-7T(g).

5.a.27. In the Opinion, the Court found that:

5.a.27.1. Facebook US licensed to Facebook Ireland the: (i) FOP Technology (a PCT), (ii) User Community Rights (an operating contribution); and (iii) Marketing Intangibles (also an operating contribution);

5.a.27.2. The income method set forth in Treas. Reg. § 1.482-7T(g) was the best method to value the CSA Contributions;

5.a.27.3. Facebook’s projections, excluding Other Revenue, were reliable, probability-weighted forecasts within the meaning of Treas. Reg. § 1.482-7T(g)(2)(vi);

⁸ January 24, 2023, Trial Tr. 121:13-22, Dkt. No. 707.

5.a.27.4. The appropriate discount rate to use in applying the income method to value the CSA Contributions was 17.7%; and

5.a.27.5. Facebook Ireland committed to keep performing, and to bear the risk of performing ad sales, user operations, and other functions under the CSA in the ROW Territory.

Respondent's Adjustment

5.a.28. In the SNOD, Respondent made periodic adjustments under section 482 and Treas. Reg. § 1.482-7(i)(6) for the Years at Issue.

5.a.29. Before issuing the SNOD, Respondent did not provide a Notice of Proposed Adjustment in connection with asserting periodic adjustments for the Years at Issue. The only explanation that Respondent has provided to Meta regarding his asserted periodic adjustments in excess of \$50 billion is the language in the SNOD.

5.a.30. Respondent's explanation for his asserted periodic adjustments in the SNOD was:

Pursuant to IRC 482 and the regulations thereunder, the income you reported from the 2010 PCT and subsequent PCTs during the duration of the CSA Activity is not commensurate with the income attributable to the transferred intangible property and that, as a result, a Periodic Trigger occurred under Treas. Reg. § 1.482-7(i)(6)(v). Therefore, you are subject to periodic adjustments for the [Years at Issue].

5.a.31. Upon information and belief, and based on Respondent's explanation in the SNOD, the Trigger PCT (as that term is used in Treas. Reg. § 1.482-7) for Respondent's periodic adjustments in the SNOD is the 2010 PCT.

5.a.32. To the extent there was a differential between the Actually Experienced Return Ratio and the nearest bound of the Periodic Return Ratio Range for the Trigger PCT, it resulted from extraordinary events beyond the control of the controlled participants and could not reasonably have been anticipated as of the date of the Trigger PCT.

5.b. Brazilian Withholding Tax.

5.b.1. During the Years at Issue, Facebook Miami, Inc. ("Facebook Miami"), a member of the Meta U.S. consolidated group, including its disregarded entity, Facebook Servicos Online Do Brasil LTDA ("Facebook Brazil"), sold advertisements in the Brazilian market for the Facebook platform. Facebook Miami did so pursuant to the Ads Creation Services Agreement ("Ads Creation Services Agreement"), under which FIL provided advertising creation services to Facebook Miami.

5.b.2. Pursuant to an Ads Dissemination Services Agreement (as amended, effective January 1, 2016), Facebook Miami was entitled to 67% of Facebook Brazil's gross receipts earned in connection with the resale of advertising dissemination services to customers in Brazil.

5.b.3. Under Brazilian law, the payment from Facebook Brazil to Facebook Miami pursuant to the Ads Dissemination Services Agreement was subject to Brazilian withholding tax at a rate of 15%.

5.b.4. In accordance with Brazilian law, Facebook Brazil timely withheld the required withholding tax amounts from each payment of service fees to Facebook Miami under the Ads Dissemination Services Agreement and timely remitted them to the Brazilian tax authority as the withholding agent.

5.b.5. For U.S. tax law purposes, the transactions between Facebook Brazil and Facebook Miami under the Ads Dissemination Services Agreement were disregarded because Facebook Brazil was a disregarded entity of Facebook Miami (*i.e.*, for U.S. tax law purposes all operations of Facebook Brazil were operations of Facebook Miami).

5.b.6. Accordingly, Facebook Miami, as part of the Meta U.S. consolidated group, claimed the corresponding foreign tax credits under sections 901 and 903 in the following amounts (as reflected in Meta's U.S. consolidated returns for the Years at Issue):

	2017	2018	2019
Annual Ads Diss. Fee (BRL)	2,224,625,701	2,986,002,187	4,206,877,402
Brazil 15% WHT (BRL)	333,693,855	447,900,328	670,120,128
Brazil 15% WHT (USD) ⁹	\$104,201,179	\$122,553,337	\$169,852,769
Claimed FTCs (USD)	\$104,201,179	\$122,553,337	\$169,852,769

5.c. Section 6662 Penalties Related to the Brazilian Withholding Tax.

5.c.1. Paragraphs 5.b.1. through 5.b.6., *supra*, are incorporated by reference.

5.c.2. The economic substance doctrine is neither relevant nor applicable to Facebook Miami’s claim of foreign tax credits in the above-referenced amounts associated with the Brazilian withholding taxes incurred on the payments between Facebook Brazil and Facebook Miami. Facebook Miami’s transactions changed Meta’s economic position in a meaningful way, and Meta had a substantial business purpose for the transactions.

5.c.3. Meta reported Facebook Brazil as a disregarded entity of Facebook Miami for each of the Years at Issue on Forms 8858 filed with its Forms 1120 for the Years at Issue.

⁹ These amounts are calculated using the average exchange rate for the U.S. dollar to a Brazilian real of 3.2024, 3.6547, and 3.9453 for 2017, 2018, and 2019, respectively.

5.c.4. Meta identified advertising services as Facebook Brazil's principal business activity for each of the Years at Issue on Forms 8858 filed with its Forms 1120 for the Years at Issue, including on line 1.h therein.

5.c.5. Meta reported the Brazilian withholding tax paid on the payment from Facebook Brazil to Facebook Miami under the Ads Dissemination Services Agreement for each of the Years at Issue on Forms 1118, Schedule B, Part I., columns (h) (for 2017) and (j) (for 2018 and 2019) filed with its Forms 1120 for the Years at Issue.

5.c.6. Meta reported the Brazilian taxes paid as a net addition on Form 8858, Schedule H, line 2 and the associated statements filed with its Forms 1120 for the Years at Issue.

5.c.7. Substantial authority existed for Meta's position claiming foreign tax credits under sections 901 and 903 for the Brazilian withholding taxes for the Years at Issue.

5.d. Brazilian Withholding Tax (Alternative Minimum Tax).

5.d.1. Paragraphs 5.b.1. through 5.b.6., *supra*, are incorporated by reference.

5.d.2. In the SNOD, Respondent increased Meta's income tax by \$76,869,698 for 2017 after making "AMT adjustments...related to Brazilian

withholding taxes....” The SNOD provides no further explanation for such adjustments.

5.e. Section 965 Aggregate Foreign Cash Position.

The UK Settlement with HMRC

5.e.1. HM Revenue & Customs (“HMRC”), the United Kingdom’s tax authority, audited Facebook UK for its taxable years ending December 31, 2010, through December 31, 2015 (the “UK Audit”). Facebook UK and HMRC settled the UK Audit in 2017, as reflected in a letter dated March 27, 2017 (the “UK Settlement”).

5.e.2. The UK Settlement required Facebook UK to include all costs in its calculation of the cost base to which an arm’s length markup was applied for its performance of intercompany services, including the costs related to Financial Reporting Standards (“FRS”) 20, a UK accounting standard for stock-based payments such as SBC. This treatment of SBC as a cost was also consistent with HMRC’s transfer pricing manual published on April 9, 2016.¹⁰

The SBC Recharge and SPRA

5.e.3. Consistent with the UK Settlement, Facebook UK included costs relating to SBC in its calculation of its cost base to which an arm’s

¹⁰ See “INTM440210 – Transfer pricing: Types of transactions: share options: general,” HMRC International Manual, <https://www.gov.uk/hmrc-internal-manuals/international-manual/intm440210>.

length markup was applied for its performance of intercompany services since 2017, including for each of the Years at Issue.

5.e.4. Meta and Facebook UK entered into the Share Purchase and Reimbursement Agreement, effective January 1, 2017 (the “SPRA”).

5.e.5. Pursuant to the SPRA, Facebook UK has consistently purchased and paid for the Meta shares it has issued to its employees as SBC since 2017, including for each of the Years at Issue.

The 2017 SBC Payment

5.e.6. On November 30, 2017, Facebook UK recorded an accrued expense for the cost of the Meta shares issued to Facebook UK employees during Facebook UK’s 2017 tax year equal to the 2017 SBC Payment amount in accordance with its ordinary business practices.

5.e.7. On December 28, 2017, Facebook UK made the 2017 SBC Payment.

5.e.8. Facebook UK made the 2017 SBC Payment pursuant to the SPRA and in accordance with the ordinary course of Meta’s business.

5.e.9. The decision to make the 2017 SBC Payment and the events leading to that decision occurred before November 2, 2017.

5.e.10. The 2017 SBC Payment and the events leading up to it were consistent with Meta’s ordinary business practices.

5.e.11. Neither the 2017 SBC Payment nor the events leading up to it were undertaken with a principal purpose of reducing Meta's section 965 tax liability.

5.e.12. Meta timely filed with its 2017 return a rebuttal statement pursuant to Notice 2018-26, § 3.04(a), to rebut the presumption the 2017 SBC Payment was undertaken with a principal purpose of reducing Meta's section 965 tax liability.

5.e.13. Meta correctly excluded the 2017 SBC Payment from its AFCP in accordance with the terms of the SPRA and section 965.

Respondent's Adjustment

5.e.14. In the SNOD, Respondent erroneously increased Meta's section 965 AFCP by \$203,193,939 for 2017 because he disregarded the 2017 SBC Payment.

5.e.15. To the extent that Respondent's 2017 section 965 AFCP adjustment in the SNOD does not concern his disregard of the 2017 SBC Payment, the SNOD provides no explanation or basis for such an adjustment.

5.f. Inclusion of SBC Costs in Cost Sharing Pool.

5.f.1. From the inception of the CSA, Meta anticipated that the regulatory requirement to include SBC in IDCs might be invalidated or withdrawn, so Meta included terms in the CSA to address such contingencies.

5.f.2. On July 27, 2015, the Tax Court in *Altera Corp. v. Commissioner*, 145 T.C. 91 (2015) (“*Altera I*”) found that Treas. Reg. § 1.482-7(d)(2) (2003) was invalid.

5.f.3. Treas. Reg. § 1.482-7(d) and the regulations invalidated by *Altera I*—Treas. Reg. § 1.482-7(d)(2) (2003)—both require that taxpayers include SBC in IDCs.

5.f.4. Relying on *Altera I*, Meta excluded SBC from its IDCs in tax years 2017 and 2018 and included a Form 8275-R, Regulation Disclosure Statement, in both its 2017 and 2018 federal income tax returns to disclose Meta’s position on the exclusion of SBC from IDCs to the IRS.

5.f.5. On June 7, 2019, the U.S. Court of Appeals for the Ninth Circuit Court reversed *Altera I*, finding the regulatory requirement to include SBC costs in IDCs to be valid (“*Altera II*”).¹¹

5.f.6. After the U.S. Supreme Court declined to grant certiorari to review *Altera II* on June 22, 2020, Meta included \$1,867,203,418 of SBC in its

¹¹ *Altera Corp. & Subs. v. Commissioner*, Nos. 16-70496, 16-70497, 2018 WL 3542989 (9th Cir. July 24, 2018, *withdrawn*, 898 F.3d 1266 (9th Cir. 2018), *superseded by* 926 F.3d 1061 (9th Cir. 2019), *reh’g en banc denied*, 941 F.3d 1200 (9th Cir. 2019), *cert. denied*, 141 S. Ct. 131 (2020). *But see* 926 F.3d at 1087 (O’Malley, J., dissenting); 941 F. 3d at 1202 (M. Smith J., joined by Callahan and Bade, JJ., dissenting from denial of rehearing en banc).

IDCs for 2019 but simultaneously included a claim for refund based on the exclusion of that SBC amount from IDCs on its originally filed 2019 federal income tax return.

5.f.7. Meta filed a Form 8275-R, Regulation Disclosure Statement, with its 2019 federal income tax return to disclose Meta's position on the exclusion of SBC from IDCs and make its refund claim.

5.f.8. The issue of whether SBC must be included as an IDC in a cost sharing arrangement akin to the CSA is currently being litigated in other cases, including cases before this Court and the U.S. District Court for the Northern District of Texas.¹²

5.g. FDII

5.g.1. For tax years beginning before January 1, 2021, taxpayers could choose to apply a reasonable interpretation of section 250 for the purpose of computing their FDII and associated FDII deduction.

5.g.2. Meta chose to apply a reasonable interpretation of section 250 to compute its FDII and associated FDII deduction for 2018 and 2019.

Revenue from Advertising Services and FDII Calculation

5.g.3. As reflected in its 2018 tax return, Meta initially determined its deduction eligible income derived from advertising services provided

¹² See *Abbott Laboratories v. Commissioner*, Dkt. No. 20227-23 (T.C. Dec. 22, 2023); *McKesson Corp. v. United States*, Dkt. No. 3:25-cv-01102 (N.D. Tex. May 2, 2025).

to persons not located within the United States (*i.e.*, its foreign-derived deduction eligible income attributable to advertising services, or “Advertising Services FDDEI”) based on the location of the advertiser.

5.g.4. Meta subsequently amended its method of calculating Advertising Services FDDEI to be based on the device location of the end users targeted to view the advertisements (the “FDDEI Redetermination Method”).

5.g.5. Meta consistently applied the FDDEI Redetermination Method to calculate its Advertising Services FDDEI and corresponding section 250 FDII for 2018, as reflected in the Rev. Proc. 94-69 Statement, and 2019, as reflected in its 2019 tax return.

5.g.6. Meta acquired the information necessary to use the FDDEI Redetermination Method in the ordinary course of its business.

5.g.7. Meta’s application of the FDDEI Redetermination Method was based on a reasonable interpretation of section 250(b)(4).

5.g.8. Meta correctly determined its Advertising Services FDDEI for 2018 and 2019 using the FDDEI Redetermination Method in accordance with section 250(b)(4).

5.g.9. In 2021, Meta timely filed the Rev. Proc. 94-69 Statement for the Years at Issue to, in part, adjust its FDII and FDII deduction calculations to reflect (i) Meta’s calculation of its Advertising Services FDDEI using the FDDEI

Redetermination Method for 2018; (ii) its change in method of apportioning research and experimental (“R&E”) expenditures from the sales method to the gross income method in accordance with Treas. Reg. § 1.861-17(e)(3) for 2018 and 2019; and (iii) its allocation of R&E expenditures to the income of Facebook Technologies Ireland Limited for 2018. As a result of these adjustments, Meta requested a refund of income taxes in the amounts of \$86,225,501 and \$24,997,662 for 2018 and 2019, respectively, in the Rev. Proc. 94-69 Statement.

5.g.10. Meta correctly determined its FDII for each of 2018 and 2019, as modified by the adjustments disclosed to the IRS in the Rev. Proc. 94-69 Statement.

5.g.11. Meta correctly determined its FDII deduction for each of 2018 and 2019, as modified by the adjustments disclosed to the IRS in the Rev. Proc. 94-69 Statement.

Respondent’s Adjustments

5.g.12. In the SNOD, Respondent erroneously decreased (i) Meta’s FDII under section 250 by \$457,824,835 and \$1,437,682,332 for 2018 and 2019, respectively, and (ii) Meta’s FDII deduction by \$171,684,313 and \$539,130,874 for 2018 and 2019, respectively, by, in part, disallowing Meta’s use of the FDDEI Redetermination Method to determine its Advertising Services FDDEI for 2018 and 2019.

5.g.13. Upon information and belief, Respondent has agreed to items (ii) and (iii) in Paragraph 5.g.9., *supra*, that were disclosed to the IRS in the Rev. Proc. 94-69 Statement.

5.g.14. To the extent Respondent's FDII and FDII deduction adjustments for 2018 and 2019 concern amounts unrelated to the Rev. Proc. 94-69 Statement disclosures identified in Paragraphs 4 and 9 therein, the SNOD provides no explanation or basis for such adjustments.

5.h. Section 965(a) Inclusion (Spain, Italy, Hong Kong, Turkey, Ireland, and Other Redeterminations).

5.h.1. During the Years at Issue, Meta directly or indirectly owned a series of foreign corporations, including Facebook Italy S.R.L. ("Facebook Italy"), Facebook Spain S.L. ("Facebook Spain"), Facebook Hong Kong Limited ("Facebook Hong Kong"), and Facebook Ireland.

Rev. Proc. 94-69 Statement Disclosures

5.h.2. On October 7, 2021, Meta timely filed the Rev. Proc. 94-69 Statement for the Years at Issue, claiming refunds, in part, due to foreign tax redeterminations in Spain, Italy, Hong Kong, Turkey, and Ireland.

5.h.3. For each of the foreign tax redeterminations, the Rev. Proc. 94-69 Statement contained information sufficient for the IRS to redetermine Meta's tax liability, including, but not limited to the names of the relevant foreign

corporations, the date the foreign taxes were accrued or paid, the amount of foreign taxes paid or accrued, and the relevant exchange rate.

5.h.4. The Rev. Proc. 94-69 Statement addressed foreign tax redeterminations that occurred after Meta’s timely filing of its 2019 U.S. federal income tax return through October of 2021. Paragraphs 5.h.5. through 5.h.30., *infra*, discuss the foreign tax redeterminations identified in the Rev. Proc. 94-69 Statement.

Spain Redetermination

5.h.5. Facebook Spain and the alleged Spanish operations of FIL were audited by the Spanish Tax Authorities (“STA”) for tax years 2013 through 2016. The STA examined Facebook Spain’s corporate income and value-added taxes, as well as Facebook Spain’s use of IP rights owned by FIH. The STA also alleged that FIL had a permanent establishment (“PE”) in Spain and was therefore taxable in Spain on the income earned through such PE.

5.h.6. Facebook Spain engaged Spanish tax counsel to contest the proposed Spanish tax assessment against Facebook Spain and FIL.

5.h.7. Facebook Spain engaged in substantial negotiations with the STA with the goal of reaching a reasonable settlement amount.

5.h.8. On the advice of Spanish tax counsel, Facebook Spain entered into a settlement agreement with the STA that included the dismissal of the PE assertions against FIL, a withholding tax adjustment for royalties paid by

Facebook Spain to FIH, and a corporate income tax (“CIT”) adjustment for Facebook Spain, but did not include a VAT adjustment or penalties. The settlement covered the tax years under audit (2013 through 2016) and was extended to also cover tax years 2017 and 2018. On or about July 13, 2020, and December 9, 2020, Facebook Spain and FIH (remitted by Facebook Spain as the withholding agent on behalf of FIH), respectively, paid the following amounts:¹³

Spain Settlement Payment	Amount (EUR)	Amount (USD)
2014-2016 WHT (FIH)	13,317,166	\$16,089,363
2017-2018 WHT (FIH)	15,873,200	\$19,007,429
2013-2017 CIT (Facebook Spain)	889,631	\$1,033,422
Total	30,079,997	\$36,130,214

5.h.9. Facebook Spain, FIL, and FIH exhausted their practical and effective remedies to reduce their Spanish tax liability for 2013 through 2018. Litigation, mutual agreement procedures (“MAP”), and arbitration were not reasonable in light of the amount at issue and the likelihood of success.

Italy Redetermination

5.h.10. Facebook Italy and the alleged Italian activities of FIL were audited by the Italian Tax Authority (“ITA”) for tax years 2010 through 2016. The ITA alleged that Facebook US (for the period from January 1, 2010, through

¹³ The amounts reflected in the settlement tables discussed in Paragraph 5.h. specifically concern the payment of foreign taxes, not related interest, fine, or penalty amounts.

September 15, 2010) and Facebook Ireland (for the period from September 15, 2010, until the end of 2016) had a PE in Italy (*i.e.*, via Facebook Italy) and were therefore taxable in Italy on income earned and sales made through such PEs. The ITA also reviewed the license arrangement between FIL and FIH granting FIL the right to exploit Facebook IP in Italy. The ITA subsequently initiated criminal proceedings against Facebook US and Facebook Ireland.

5.h.11. Facebook Italy engaged Italian tax counsel to contest the proposed Italian income tax assessment and criminal proceedings against Facebook US and FIL and their alleged PEs.

5.h.12. Facebook Italy engaged in substantial negotiations with the ITA with the goal of reaching a reasonable settlement amount.

5.h.13. On the advice of Italian tax counsel, Facebook Italy entered into a settlement that resolved the proposed Italian income tax assessment for tax years 2010 through 2016 and eliminated the ITA’s PE allegation. On or about November 30, 2020, FIH and Facebook Italy paid the following amounts:

Italy Settlement Payment	Amount (EUR)	Amount (USD)
2012-2016 (FIH)	63,339,382	\$71,036,591
2012-2016 (Facebook Italy)	5,006,512	\$5,619,065
Total	68,345,894	\$76,655,656

5.h.14. Facebook US, Facebook Ireland, and Facebook Italy exhausted their practical and effective remedies to reduce their Italian tax liability for 2010 through 2016. The only other available remedy was litigation, which was

not reasonable in light of the amounts at issue, significant costs involved in litigating, parallel criminal proceedings, and low likelihood of success.

Hong Kong Redetermination

5.h.15. Facebook Hong Kong and the alleged Hong Kong activities of FIL were audited by the Hong Kong Inland Revenue Department (the “IRD”) for Facebook Hong Kong’s 2011/2012 through 2018/2019 tax years. The IRD alleged that Facebook Hong Kong was not properly remunerated by FIL and that FIL had a PE in Hong Kong and was therefore taxable in Hong Kong on the income earned through such PE.

5.h.16. Facebook Hong Kong engaged Hong Kong tax counsel to contest the proposed Hong Kong tax assessment against Facebook Hong Kong and FIL.

5.h.17. Facebook Hong Kong engaged in substantial negotiations with the IRD with the goal of reaching a reasonable settlement amount.

5.h.18. On the advice of Hong Kong tax counsel, Facebook Hong Kong entered into a settlement agreement with the IRD and, on or about November 3, 2020, paid the following amounts:

Hong Kong Settlement Payment	Amount (HKD)	Amount (USD)
2012-2017	32,116,782	\$4,143,887
2018	17,564,690	\$2,241,137
Total	49,681,472	\$6,385,024

5.h.19. Facebook Hong Kong and FIL exhausted their practical and effective remedies to reduce their Hong Kong tax liability for the 2011/2012 through 2018/2019 tax years. The cost of escalating the dispute to the IRD's appeal function, court, or competent authority was not reasonable in light of the amount at issue and the likelihood of success. Correlative relief for FIL from the Irish Revenue Authority would have been impossible to obtain.

Turkey Redetermination

5.h.20. The alleged Turkish activities of FIL were audited by the Turkish tax authority for tax years 2013 through 2016 and tax years 2017 through 2019. The Turkish tax authority alleged that FIL had a PE in Turkey due to it deriving income from Turkey through the Facebook website, and that it was therefore taxable in Turkey on such income.

5.h.21. FIL engaged Turkish tax counsel to contest the proposed Turkish tax assessment against it.

5.h.22. On the advice of Turkish tax counsel, FIL availed itself of the Turkish Amnesty Law (Law. No. 7143) for tax years 2013 through 2016 and 2018, which allows taxpayers to finalize disputes with the Turkish tax authorities by paying reduced amounts of corporate and value-added taxes. On or about January 28, 2019, and September 30, 2021, FIL paid the following amounts:

Turkey Amnesty Payment	Amount (TRY)	Amount (USD)
2013-2016 (FIL)	1,678,295	\$314,753
2018 (FIL)	81,792,455	\$9,203,711
Total	83,470,750	\$9,518,464

5.h.23. FIL exhausted its practical and effective remedies to reduce its Turkish tax liability for 2013 through 2016. The cost of litigating the dispute or using MAP was not reasonable in light of the amounts at issue and the likelihood of success, given the availability of the amnesty program. FIL did not seek correlative relief as its liability would have remained the same.

Ireland (AQ) Redetermination

5.h.24. FIL was audited by the Irish Revenue Commissioners (“Irish Revenue”) for FIL’s tax accounting periods from January 1, 2012, through December 31, 2015. Irish Revenue alleged that the pricing of the IP license fee paid by FIL to its affiliate, FIH, was not arm’s length and adjusted FIL’s taxable income accordingly.

5.h.25. FIL engaged Irish tax counsel to contest the proposed Irish tax assessment against FIL.

5.h.26. FIL engaged in substantial negotiations with Irish Revenue with the goal of reaching a reasonable settlement amount.

5.h.27. On the advice of Irish tax counsel, FIL entered into a settlement agreement with Irish Revenue on November 3, 2020, and, on or about November 6, 2020, paid the following amounts:

Ireland Settlement Payment	Amount (EUR)	Amount (USD)
2012-2015 (FIL)	53,242,819	\$63,286,365
Total	53,242,819	\$63,286,365

5.h.28. FIL exhausted its effective and practical remedies to reduce its Irish tax liability for the period of January 1, 2012 through December 31, 2015. Litigation was the only alternative to settlement and was not reasonable in light of the inherent uncertainty in transfer pricing litigation and the prospect of further assessment and penalties.

Statements Furnished Under Treas. Reg. § 1.905-4(b)

5.h.29. On each of February 1, 2022, July 26, 2022,¹⁴ and February 3, 2023, Meta submitted to Respondent a Statement Furnished Under Treas. Reg. § 1.905-4(b) notifying him of foreign tax redeterminations that affected Meta's U.S. tax liability that occurred after the submission of the Rev. Proc. 94-69 Statement (*i.e.*, after October 2021).

¹⁴ The July 26, 2022, Statement Furnished Under Treas. Reg. § 1.905-4(b) was resubmitted on April 4, 2023, following the correction of a typographical error.

5.h.29.1. On February 1, 2022, Meta notified Respondent of the following redeterminations and their impact on Meta's U.S. tax liability: (i) an increase in Taiwanese withholding taxes for FIL's 2017-2019 tax years, (ii) an increase in Taiwanese tax liability for the Taiwan branch of Edge Network Services Ireland Ltd.'s 2019 tax year, and (iii) an increase in Belgian tax liability for Facebook Belgium Sprl's 2018-2019 tax years.

5.h.29.2. On July 26, 2022, Meta notified Respondent of the following redeterminations and their impact on Meta's U.S. tax liability: (i) an increase in Irish tax liability for FIL's 2016-2019 tax years, (ii) a reduction in Taiwanese withholding taxes for FIL's 2017-2018 tax years, and (iii) an increase in Swiss tax liability for Facebook Switzerland Sarl's 2018-2019 tax years.

5.h.29.3. On February 3, 2023, Meta notified Respondent of the following redeterminations and their impact on Meta's U.S. tax liability: (i) an increase in German tax liability for the German branch of Edge Network Services Limited's 2017 tax year, (ii) an increase in German tax liability for Fayteq GmbH's 2019 tax year, (iii) a reduction in Irish tax liability for Qstar Limited's 2019 tax year, (iv) an increase in Columbian tax liability for Facebook Colombia S.A.S.'s 2019 tax year, (v) an increase in Singaporean tax liability for Facebook Singapore Pte. Ltd.'s 2019 tax year, and (vi) an increase in New Zealand tax liability for Facebook New Zealand Limited's 2019 tax year.

5.h.29.4. Meta anticipated additional adjustments would be made by foreign tax authorities, and Respondent informed Meta that Respondent would not consider a statement furnished under Treas. Reg. § 1.905-4(b) submitted after October 31, 2023.

5.h.30. For each of the foreign tax redeterminations identified on the Statements Furnished Under Treas. Reg. § 1.905-4(b), as well as those additional redeterminations made by foreign tax authorities, (i) Meta exhausted all effective and practical remedies within the meaning of Treas. Reg. § 1.901-2(e)(5) to reduce under foreign law its tax liabilities giving rise to the submitted foreign tax redeterminations, and (ii) the submitted foreign tax redeterminations did not fall under any of the exceptions listed in Treas. Reg. § 1.905-3T(d)(3).

Meta's Informal Claim for Refund

5.h.31. On March 29, 2018, Respondent issued Facebook a Statutory Notice of Deficiency alleging deficiencies of tax for 2011 and 2013 (the “2011-2013 SNOD”).

5.h.32. Among Respondent's determinations in the 2011-2013 SNOD was that Facebook US “transferred property associated with your 2012 acquisition and subsequent further development of Instagram (Instagram property), effective October 1, 2013 to Facebook Ireland” and reallocated income from Facebook Ireland to Facebook US based on Respondent's determination that

“[p]ursuant to Section 482, [...] the value of the transferred Instagram property is \$1,067,662,614,” and in connection with that determination Respondent increased Facebook’s income in the form of gross royalties by \$830,662,614 for 2013.

5.h.33. On June 26, 2018, in Tax Court Docket No. 12738-18 (“Docket. No. 12738-18”), Facebook timely filed a petition in this Court challenging Respondent’s adjustments set forth in the 2011-2013 SNOD.

5.h.34. On June 22, 2023, in a Stipulation of Settled Issues in Docket No. 12738-18, Respondent and Facebook stipulated that “Petitioner’s income in the form of gross royalties is increased by \$498,397,568 for the transfer of Instagram property to Facebook Ireland Holdings Unlimited (adjustment 1b in the notice of deficiency).”

5.h.35. On October 24, 2023, Meta notified the IRS of a claim for refund for the Years at Issue relating to the June 21, 2023, Stipulation of Settled Issues in Docket No. 12738-18 (the “2017-2019 Refund Claim”).

5.h.36. The 2017-2019 Refund Claim addressed the collateral consequences of the increase to Meta’s gross royalties income of approximately \$498.4 million related to payments from Facebook Ireland to Facebook US for the Instagram intangible property transferred from Facebook US to Facebook Ireland in 2013.

5.h.37. As detailed in the 2017-2019 Refund Claim, the increased royalties increased Facebook Ireland's basis in the Instagram intangible property and resulted in higher amortization expenses for each of Facebook Ireland's 2013 through 2019 tax years.

5.h.38. Facebook Ireland's increased amortization expenses resulted in (i) a decrease in Meta's section 956 inclusion by approximately \$141.2 million for 2017 and (ii) a decrease in Meta's section 951A GILTI inclusion by approximately \$33.2 million in both 2018 and 2019.

5.h.39. As a result of the changes described in Paragraph 5.h.34., *supra*, Meta claimed a refund of approximately \$11.3 million, \$3.4 million, and \$3.4 million for 2017, 2018, and 2019, respectively.

Respondent's Adjustments

5.h.40. Respondent adjusted Meta's section 965(a) inclusion in 2017 by \$407,648,525 because, according to the SNOD, Respondent did not include Meta's foreign income taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in his calculation of Meta's section 965(a) inclusion.

5.h.41. The SNOD provides no explanation or basis for Respondent's allegation that Meta is not entitled to include foreign income taxes

resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in its section 965(a) inclusion calculations.

5.h.42. To the extent Respondent's section 965(a) inclusion adjustments for 2017 concern amounts unrelated to Meta's disclosures to the IRS, the SNOD provides no explanation or basis for such adjustments.

5.i. Section 965 Deemed Paid Taxes (Spain, Italy, Hong Kong, Turkey, Ireland, and Other Redeterminations).

5.i.1. Paragraphs 5.h.1. through 5.h.30., *supra*, are incorporated by reference.

Respondent's Adjustments

5.i.2. Respondent adjusted Meta's deemed paid taxes attributable to Meta's section 965(a) inclusion by \$4,679,012 because, according to the SNOD, Respondent did not include Meta's foreign income taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in his calculation of Meta's section 965 deemed paid taxes.

5.i.3. The SNOD provides no explanation or basis for Respondent's allegation that Meta is not entitled to include foreign income taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in its section 965 deemed paid taxes calculations.

5.i.4. To the extent Respondent's section 965(a) deemed paid taxes adjustments for 2017 concern amounts unrelated to Meta's disclosures to the IRS, the SNOD provides no explanation or basis for such adjustments.

5.j. GILTI Inclusion (Spain, Italy, Hong Kong, Turkey, Ireland, and Other Redeterminations).

5.j.1. Paragraphs 5.h.1. through 5.h.30., *supra*, are incorporated by reference.

Respondent's Adjustments

5.j.2. Respondent adjusted Meta's section 951A GILTI inclusion by \$66,114,493 and \$20,404,062 for 2017 and 2018, respectively, because, according to the SNOD, Respondent did not include Meta's foreign income taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in his calculation of Meta's section 951A GILTI inclusion.

5.j.3. The SNOD provides no explanation or basis for Respondent's allegation that Meta is not entitled to include foreign income taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in its section 951A GILTI inclusion calculations.

5.j.4. To the extent Respondent's section 951A GILTI inclusion adjustments for 2018-2019 concern amounts unrelated to Meta's disclosures to the IRS, the SNOD provides no explanation or basis for such adjustments.

5.k. Section 951A GILTI Deemed Paid Taxes.

5.k.1. Paragraphs 5.h.1. through 5.h.30., *supra*, are incorporated by reference.

Respondent's Adjustments

5.k.2. Respondent adjusted Meta's deemed paid taxes attributable to Meta's section 951A GILTI inclusion by \$2,538,933 and \$13,523,400 for 2018 and 2019, respectively, because, according to the SNOD, Respondent did not include Meta's foreign taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in his calculation of Meta's section 951A GILTI deemed paid taxes.

5.k.3. The SNOD provides no explanation or basis for Respondent's allegation that Meta is not entitled to include foreign income taxes resulting from foreign tax redeterminations attributable to Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) in its calculation of section 951A GILTI deemed paid taxes.

5.k.4. To the extent Respondent's section 951A GILTI deemed paid taxes adjustments for 2018-2019 concern amounts unrelated to Meta's disclosures to the IRS, the SNOD provides no explanation or basis for such adjustments.

5.1. Research Credit.

5.1.1. On June 24, 2025, Meta and Respondent entered into a Closing Agreement on Final Determination Covering Specific Matters (“Meta’s Closing Agreement”) regarding Meta’s claiming of the credit for increasing research activities under section 41 (“research credit”) on its U.S. federal income tax returns for each of the Years at Issue.

5.1.2. Meta’s Closing Agreement provided the following:

5.1.2.1. For the Years at Issue, Meta claimed the following amounts of qualified research expenditures (“QREs”) on its U.S. federal income tax returns for 2017, 2018, and 2019, respectively: \$4,940,526,859, \$6,157,724,884, and \$7,537,600,552.

5.1.2.2. For 2017, 2018, and 2019, Meta’s allowable QREs were \$3,671,077,149, \$3,977,733,898, and \$5,092,122,665, respectively.

5.1.2.3. For the Years at Issue, Meta’s allowable QREs were to be allocated to WhatsApp, LLC (“WhatsApp”) on a proportionate basis in accordance with Treas. Reg. § 1.41-6(c).

5.1.2.4. WhatsApp was a disregarded entity as of the date of Meta’s Closing Agreement but was a corporation during the Years at Issue.

5.1.2.5. During the Years at Issue, WhatsApp was not a part of Meta’s consolidated group.

5.1.2.6. During the Years at Issue, WhatsApp was a member of Meta’s section 41(f)(5) controlled group.

5.1.3. On June 5, 2025, WhatsApp and Respondent entered into a Closing Agreement on Final Determination Covering Specific Matter (“WhatsApp’s Closing Agreement”) for its 2018-2019 tax years. Respondent did not adjust WhatsApp’s claimed QREs or research credit for its 2017 tax year.

5.1.4. WhatsApp’s Closing Agreement provided that for 2018-2019, WhatsApp’s allowable QREs were \$200,000,000 for 2018 and \$20,500,000 for 2019, and that WhatsApp’s allowable research credits were \$13,653,037 for 2018 and \$1,779,121 for 2019.

5.1.5. In the SNOD, Respondent improperly adjusted Meta’s research credit for the Years at Issue in the following amounts:

Tax Year	Meta Section 41 Credit Adjustment
2017	(\$26,271,361)
2018	(\$238,526,523)
2019	(\$201,069,883)

5.1.6. In accordance with Meta’s Closing Agreement and WhatsApp’s Closing Agreement, the following are the correct amount of QREs and research credits for Meta and WhatsApp for each of the Years at Issue, respectively:

	Meta		WhatsApp	
	QREs	Research Credits	QREs	Research Credits
2017	\$3,671,077,149	\$255,724,650	\$909,325,060	\$63,342,944
2018	\$3,977,733,898	\$271,540,744	\$200,000,000	\$13,653,037
2019	\$5,092,122,666	\$349,122,349	\$20,500,000	\$1,405,506

Respondent’s Adjustments

5.1.7. Respondent adjusted Meta’s allowed section 41 qualified research expenses and the associated section 41 research credit for each of the Years at Issue because, according to the SNOD, Meta improperly included qualified research expenses attributable to a member of its section 41(f)(5) controlled group of corporations (who was not a member of its consolidated group for U.S. federal income tax purposes) in its research expense and research credit calculations reflected on its tax returns for the Years at Issue.

5.1.8. The SNOD provides no further explanation or basis for such adjustments.

5.m. Adjustments that affect Income, Taxes or Credits and Memo to Adjustments.

5.m.1. In the SNOD, Respondent includes certain “Adjustments that Affect Income, Taxes, and Credits,” “Memo Adjustments,” and “Computational Adjustments.”

5.m.2. Respondent’s descriptions of the Adjustments that Affect Income, Taxes, and Credits and Memo Adjustments are generally limited to a single

sentence stating the amounts Respondent adjusted for the Years at Issue. The SNOD does not provide further explanation or basis for such adjustments.

5.m.3. Respondent's descriptions of the Computational Adjustments are generally limited to a single sentence stating the amounts Respondent adjusted for the Years at Issue relating to other adjustments in the SNOD. The SNOD does not provide further explanation or basis for such adjustments.

5.m.4. Respondent did not provide any Notices of Proposed Adjustment in connection with asserting any of the Adjustments that Affect Income, Taxes, and Credits, Memo Adjustments, or Computational Adjustments for the Years at Issue.

5.m.5. Upon information and belief, Respondent did not account for one or more of the errors alleged in this petition in connection with asserting the Adjustments that Affect Income, Taxes, and Credits, Memo Adjustments, or Computational Adjustments for the Years at Issue, and such errors impact the amounts asserted by Respondent in the SNOD.

5.n. Adjustments from Prior Tax Years.

5.n.1. Meta's 2010 tax year is before this Court in Docket No. 21959-16. Following the Opinion, Meta and Respondent submitted materials for

calculations pursuant to Rule 155. The Court's Rule 155 calculations and its decision for 2010 may impact adjustments for the Years at Issue.

5.n.2. Meta's 2011 and 2013 tax years are before this Court in Tax Court Docket No. 12738-18. The outcome of issues docketed for 2011 and 2013 may impact adjustments for the Years at Issue.

5.n.3. Meta's 2014, 2015, and 2016 tax years are each currently before Respondent's Office of Appeals. The outcome of issues in 2014, 2015, and 2016 may impact adjustments for the Years at Issue.

5.n.4. Upon information and belief, Respondent adjusted neither Meta's income nor his adjustments to Meta's income to account for the impact of outstanding issues in 2010, 2011, 2013, 2014, 2015, or 2016.

5.o. Interest Computation.

5.o.1. In January 2020, public health officials in China identified a novel coronavirus as the causative agent of an outbreak of pneumonia.

5.o.2. On January 7, 2020, the United States Centers for Disease Control and Prevention ("CDC") established an incident management structure to guide a response to the novel coronavirus.

5.o.3. On January 20, 2020, the CDC reported the first laboratory-confirmed case of the 2019 Novel Coronavirus in the U.S. from samples taken on January 18 in Washington state.

5.o.4. On March 13, 2020, President Donald J. Trump issued a Letter to Federal Agencies on an Emergency Determination that declared a nationwide emergency under the Stafford Act.¹⁵

5.o.5. On March 22, 2020, President Donald J. Trump declared a major disaster area in California “beginning on January 20, 2020, and continuing,” due to pandemic conditions (the “California Disaster Declaration”).¹⁶

5.o.6. The President appointed the Federal Emergency Management Agency (“FEMA”) to coordinate the response to the pandemic.

5.o.7. On February 10, 2023, FEMA issued a notice amending the California Disaster Declaration to end on May 11, 2023, stating “the incident period for all COVID-19 major disaster declarations ... will close effective May 11, 2023.”¹⁷

5.o.8. During the period beginning on January 20, 2020, and continuing through July 10, 2023, Meta’s principal place of business was in California. At all relevant times for the California Disaster Declaration Meta was a qualified taxpayer as defined in section 7508A(d)(2).

¹⁵ 2020 Daily Comp. Pres. Doc. 159, available at [govinfo.gov](https://www.govinfo.gov) (Mar. 13, 2020).

¹⁶ California; Major Disaster and Related Determinations, 85 Fed. Reg. 20703-02 (Apr. 14, 2020).

¹⁷ Major Disaster Declarations and Related Determinations: Expiration of COVID-19-Related Measures, 88 Fed. Reg. 8884 (Feb. 10, 2023).

5.o.9. As a result, pursuant to section 7508A the period beginning on January 20, 2020, and continuing through July 10, 2023, must be disregarded in determining the amount of any interest, penalty, additional amount, or addition to tax.

WHEREFORE, Meta requests that this Court hear this case, determine that no deficiency is due from Meta, grant Meta the refunds described in this petition, and grant Meta such other and further relief as this Court deems just and proper.

Respectfully submitted,



Scott H. Frewing
T.C. No. FS0327



Andrew P. Crousore
T.C. No. CA0420

Baker & McKenzie LLP
600 Hansen Way
Palo Alto, California 94304
(650)856-2400

Attorneys for Petitioner
Meta Platforms, Inc. & Subsidiaries

Dated: December 4, 2025



Received
12/04/25 08:29 pm

Filed
12/04/25

Meta Platforms, Inc.,

Petitioner

v.

Commissioner of Internal Revenue

Respondent

Electronically Filed
Docket No. 16081-25
Document No. 4

Attachment to Petition

SERVED 12/05/25

Form 4089-B (October 1999)	Department of the Treasury - Internal Revenue Service Notice of Deficiency - Waiver	Symbols SE:S:E:FE:TS:W:G38
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Name and address of taxpayer(s) Social Security or Employer Identification Number

META PLATFORMS INC. AKA META PLATFORMS INC & SUBSIDIARIES
FKA FACEBOOK INC. & SUBSIDIARIES
1 HACKER WAY
MENLO PARK, CA 94025

Kind of Tax INCOME	<input checked="" type="checkbox"/> Copy to Authorized Representative REBECCA HOWARD 5250 NORTH PALM AVENUE STE 300 FRESNO, CA 93704
---------------------------	---

DEFICIENCY - Increase in Tax and Penalties		
Tax Year Ended:	Tax Increase	Penalties
		6662(i)
December 31, 2017	7,756,033,831.00	\$30,747,879.00
December 31, 2018	3,916,911,219.00	\$27,319,514.00
December 31, 2019	4,218,311,556.00	
Total(s)	15,891,256,606.00	\$58,067,393.00

See attached explanation for the above deficiencies

I consent to the immediate assessment and collection of the deficiencies (increase in tax and penalties) shown above, plus any interest provided by law.

Your Signature (Date signed)

Spouse's Signature (If A Joint Return Was Filed) (Date signed)

Taxpayer's Representative Sign Here (Date signed)

Corporate Name _____

Corporate Officers Sign Here

	(Signature)	(Title)	(Date signed)
	(Signature)	(Title)	(Date signed)

If you agree, please sign one copy and return it; keep the other copy for your records.

Instructions for form 4089-B

Note:

If you consent to the assessment of the amounts shown in this waiver, please sign and return it in order to limit the accumulation of interest and expedite our bill to you. Your consent will not prevent you from filing a claim for refund (after you have paid the tax) if you later believe you are entitled to a refund. It will not prevent us from later determining, if necessary, that you owe additional tax; nor will it extend the time provided by law for either action.

If you later file a claim and the Internal Revenue Service disallows it, you may file suit for refund in a district court or in the United States Claims Court, but you may not file a petition with the United States Tax Court.

Who Must Sign

If this waiver is for any year(s) for which you filed a joint return, both you and your spouse must sign the original and duplicate of this form. Sign your name exactly as it appears on the return. If you are acting under a power of attorney for your spouse, you may sign as agent for him or her.

For an agent or attorney acting under a power of attorney, a power of attorney must be sent with this form if not previously filed.

For a person acting in a fiduciary capacity (executor, administrator, trustee), file Form 56, Notice Concerning Fiduciary Relationship, with this form if not previously filed.

For a corporation, enter the name of the corporation followed by the signature and title of the officer(s) authorized to sign.

Optional Paragraphs

A check in the block to the left of a paragraph below indicates that the paragraph applies to your situation.

- The amount shown as the deficiency may not be billed, since all or part of the refund due has been held to offset all or a portion of the amount of the deficiency. The amount that will be billed, if any, is shown on the attached examination report.
- The amount shown as a deficiency may not be billed, since the refund due will be reduced by the amount of the deficiency. The net refund due is shown on the attached examination report.

Form 4089-B (October 1999)	Department of the Treasury - Internal Revenue Service Notice of Deficiency - Waiver	Symbols SE:S:E:FE:TS:W:G38
--------------------------------------	---	--------------------------------------

Name and address of taxpayer(s) Social Security or Employer Identification Number

META PLATFORMS INC. AKA META PLATFORMS INC. & SUBSIDIARIES
FKA FACEBOOK INC. & SUBSIDIARIES
1 HACKER WAY
MENLO PARK, CA 94025

Kind of Tax INCOME	<input checked="" type="checkbox"/> Copy to Authorized Representative JON M CONTRERAS 5250 NORTH PALM AVENUE STE 300 FRESNO, CA 93704
---------------------------	--

DEFICIENCY - Increase in Tax and Penalties		
Tax Year Ended:	Tax Increase	Penalties
		6662(i)
December 31, 2017	\$7,756,033,831.00	\$30,747,879.00
December 31, 2018	\$3,916,911,219.00	\$27,319,514.00
December 31, 2019	\$4,218,311,556.00	
Total(s)	\$15,891,256,606.00	\$58,067,393.00

See attached explanation for the above deficiencies

I consent to the immediate assessment and collection of the deficiencies (increase in tax and penalties) shown above, plus any interest provided by law.

Your Signature (Date signed)

Spouse's Signature (If A Joint Return Was Filed) (Date signed)

Taxpayer's Representative Sign Here (Date signed)

Corporate Name _____

Corporate Officers Sign Here (Signature) (Title) (Date signed)

(Signature) (Title) (Date signed)

If you agree, please sign one copy and return it; keep the other copy for your records.

Instructions for form 4089-B

Note:

If you consent to the assessment of the amounts shown in this waiver, please sign and return it in order to limit the accumulation of interest and expedite our bill to you. Your consent will not prevent you from filing a claim for refund (after you have paid the tax) if you later believe you are entitled to a refund. It will not prevent us from later determining, if necessary, that you owe additional tax; nor will it extend the time provided by law for either action.

If you later file a claim and the Internal Revenue Service disallows it, you may file suit for refund in a district court or in the United States Claims Court, but you may not file a petition with the United States Tax Court.

Who Must Sign

If this waiver is for any year(s) for which you filed a joint return, both you and your spouse must sign the original and duplicate of this form. Sign your name exactly as it appears on the return. If you are acting under a power of attorney for your spouse, you may sign as agent for him or her.

For an agent or attorney acting under a power of attorney, a power of attorney must be sent with this form if not previously filed.

For a person acting in a fiduciary capacity (executor, administrator, trustee), file Form 56, Notice Concerning Fiduciary Relationship, with this form if not previously filed.

For a corporation, enter the name of the corporation followed by the signature and title of the officer(s) authorized to sign.

Optional Paragraphs

A check in the block to the left of a paragraph below indicates that the paragraph applies to your situation.

- The amount shown as the deficiency may not be billed, since all or part of the refund due has been held to offset all or a portion of the amount of the deficiency. The amount that will be billed, if any, is shown on the attached examination report.
- The amount shown as a deficiency may not be billed, since the refund due will be reduced by the amount of the deficiency. The net refund due is shown on the attached examination report.

Continuation Sheet

NAME: Meta Platforms Inc. AKA Meta Platforms Inc. & Subsidiaries TIN: XXXXXXXXXX

Interest on Deficiencies

Interest on Deficiencies will accrue from the due date of the return until paid.

IRC section 6662(i)

Since we determined that your return had a nondisclosed noneconomic substance transaction, a penalty under IRC 6662(i) applies. A nondisclosed noneconomic substance transaction is any portion of a transaction described in section 6662(b)(6) where the relevant facts affecting the tax treatment are not adequately disclosed in the return or in a statement attached to the return. The penalty is 40 percent of the underpayment attributable to the nondisclosed transaction. In addition, interest shall be imposed on the penalty if not paid within 21 calendar days (10 business days if the amount for which notice and demand is made equals or exceeds \$100,000) from the date of notice and demand for the penalty's payment to the date of payment. See IRC 6662(b)(6), (i) and the attached computation.

Alternatively, it is determined that all or part of the underpayment of tax is a substantial understatement of income tax, since the resulting understatement of tax exceeds the greater of 10 percent of the tax required to be shown on the return or \$5,000 (\$10,000 if a corporation). Consequently, there is added to the tax an amount equal to 20 percent of such underpayment of tax pursuant to I.R.C. § 6662.

Form **4549-A**
(December 2020)

Department of the Treasury - Internal Revenue Service

Report of Income Tax Examination Changes

Name and address of taxpayer META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES 1 HACKER WAY MENLO PARK, CA 94025	Taxpayer identification number [REDACTED]	Return form number 1120	
	Person with whom examination changes were discussed.	Name and title Larry Chou Tax Manager	
	Period Ended 12-31-2017	Period Ended 12-31-2018	Period Ended 12-31-2019
1 Adjustments to income			
a Per RAR - Form 4549-B's	22,238,541,207	16,917,650,068	19,058,853,618
b.			
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			
k.			
l.			
m.			
n.			
o.			
p.			
2. Total adjustments	22,238,541,207	16,917,650,068	19,058,853,618
3. Taxable income per return or as previously adjusted	5,113,763,037	13,173,768,914	20,546,694,071
4 Corrected taxable income	27,352,304,244	30,091,418,982	39,605,547,689
Tax method			
Filing status			
5 Tax	9,573,306,485	6,319,197,986	8,317,430,624
6. Additional taxes/Alternative minimum tax	0	0	0
7. Corrected tax liability	9,573,306,485	6,319,197,986	8,317,430,624
8 Less			
a Foreign Tax Credit	195,952,418	291,870,895	370,869,670
credits b Other Subpart B Credits	0	0	0
c. General Business Credit	565,680,537	264,805,294	445,271,113
d Minimum Tax Credit/Bond Credits	54,883,684	0	0
9. Balance (line 7 less lines 8a through 8d)	8,756,789,846	5,762,521,797	7,501,289,841
10. Plus			
a. Credit Recapture & Other Taxes	0	0	58,225
other b. Alternative Minimum Tax (Before 2000)	N/A	N/A	N/A
taxes c. Environmental Tax & Add-On Minimum Tax	N/A	N/A	N/A
d. S965 Transition Tax	2,852,755,615	N/A	N/A
11. Total corrected tax liability (line 9 plus lines 10a through 10d)	11,609,545,461	5,762,521,797	7,501,348,066
12. Total tax shown on return or as previously adjusted	3,853,511,630	1,845,610,578	3,283,036,510
13. Adjustments to:			
a	0	0	0
b	0	0	0
c	0	0	0
14. Deficiency-Increase in tax or (overassessment-decrease in tax) (line 11 less line 12 adjusted by lines 13a through 13c)	7,756,033,831	3,916,911,219	4,218,311,556
15. Adjustments to prepayment credits - increase (decrease)	0	0	0
16. Balance due or (overpayment) - (line 14 adjusted by line 15) (excluding interest and penalties)	7,756,033,831	3,916,911,219	4,218,311,556

Name of taxpayer	Taxpayer identification number	Return form number	
META PLATFORMS INC	[REDACTED]	1120	
	Period Ended	Period Ended	Period Ended
17. Penalties, additions to tax, and additional amounts -- IRC sections	12-31-2017	12-31-2018	12-31-2019
a. Accuracy-Nondisclosed Noneconomic Substance Transaction (6662(a)(i))	30,747,879	27,319,514	
b.			
c.			
d.			
e.			
f.			
g.			
h.			
i.			
j.			
k.			
l.			
m.			
n.			
18. Total penalties, additions to tax, and additional amounts	30,747,879	27,319,514	
19. Summary of taxes, penalties and interest			
a. Balance due or (overpayment) taxes - (line 16, page 1)	7,756,033,831	3,916,911,219	4,218,311,556
b. Penalties and additions (line 18) - computed to	30,747,879	27,319,514	
c. Interest** (IRC § 6601) - estimated and computed to			
d. Amount due or (refund) - (sum of lines a, b, and c)	7,786,781,710	3,944,230,733	4,218,311,556

**Interest, as provided by law, will be charged on any unpaid amount until it is paid in full.

Other information


The taxpayer made a timely election pursuant to its IRC 965 tax liability reported for tax year 201712. For year 201712, IRC 965 tax liability has been decreased by \$20,413,694. Based upon a review of the taxpayer's payment history as of the closing date of the exam, the following revised amount of IRC 965 tax liability is allocated to the installment payments & any delinquent amounts are included in the current amount of tax due above.

You reported Sec 965 transition tax on the original year 201712 tax return in the amount of \$2,873,169,309. You made an election under IRC 965 (h) to pay the transition tax over 8 years. As a result of our examination, we have determined your corrected transition tax is \$2,852,755,615.

Future installments were recalculated based on Sec 965 tax liability per exam. As of the date of this Form 4549-A, you have made payments totaling \$1,882,119,388. This leaves a balance of \$970,636,227 of which \$970,636,227 is delinquent & currently due. Your revised future installment amount is \$0 because all unpaid Sec 965 tax owed is currently due. This report does not include interest. Interest will be computed on any deficiency from the due date of the return (excluding extensions) until paid. Interest will be billed at a later date.

The Sec 965(h) deferred balance on the tax module is \$0.

Failure to make timely payments will trigger an acceleration event with limited exceptions. You are required to file Form 965-A with all subsequent year(s) tax returns until Sec 965 transition tax is fully paid.

Examiner's signature	Employee ID	Office	Date
 2025 09 11 10:48:24 -0700'	1000676910	Oakland, CA	7/18/2025

The Internal Revenue Service has agreements with state tax agencies under which information about federal tax, including increases or decreases, is exchanged with the states. If this change affects the amount of your state income tax, you should amend your state return by filing the necessary forms.

You may be subject to backup withholding if you underreport your interest, dividend, or patronage dividend income you earned and do not pay the required tax. The IRS may order backup withholding (withholding of a percentage of your dividend and/or interest payments) if the tax remains unpaid after it has been assessed and four notices have been issued to you over a 120-day period.

Form **4549-B** (August 2019) Department of the Treasury - Internal Revenue Service
Report of Income Tax Examination Changes

Name and address of taxpayer META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES I HACKER WAY MENLO PARK, CA 94025	Taxpayer identification number [REDACTED] Entity
---	--

	Adjustments That Affect Income, Taxes, and Credits	Period Ended 12-31-2017	Period Ended 12-31-2018	Period Ended 12-31-2019
CBA-301	Brazil WHT	76,869,698	68,298,785	91,243,485
CBA-301	Brazil WHT (AMT)	76,869,698	0	0
CBA-302	FDII (F8993)	0	457,824,835	1,437,682,332
CBA-314	Subpart F-Deemed Paid Foreign Taxes	0	0	21,371
CBA-314	Subpart F-Deemed Paid Foreign Taxes	0	(83,070)	0
CBA-315	FSI For Subpart F & Sec 78	0	(17,780)	0
CBA-316	GILTI Inclusion	0	(66,114,493)	(20,404,062)
CBA-317	GILTI Sec 78 Gross-Up	0	3,173,667	(16,904,250)
CBA-318	FSI 951A GILTI	0	66,114,493	20,404,062
CBA-319	FSI 951A GILTI Sec 78 Gross-Up	0	(3,173,667)	16,904,250
CBA-320	FSI 951A GILTI Sec 250 Deduction	0	(31,470,413)	(18,654,156)
CBA-321	951A GILTI Deemed Paid Taxes	0	(2,538,933)	13,523,400
CBA-323	Section 901 Creditable Taxes (AMT)	(4,633,989)	0	0
CBA-323	Section 901 Creditable Taxes	(4,633,989)	0	0
CBA-324	2017 FTC ODL-General	(384,408,635)	0	0
CBA-324	2017 FTC ODL-General-Pre-2018	(384,408,635)	0	0
CBA-325	2017 FTC ODL-Passive	555,855	0	0
CBA-325	2017 FTC ODL-Passive-Pre-2018	555,855	0	0
CBA-326	2018 Foreign Branch-Carryback To 2017 General	0	42,879,800	0
CBA-326	2018 Foreign Branch-Carryback To 2017 General	0	(42,879,800)	0
CBA-327	FTC Foreign Branch Income	0	309,008,372	198,881,542
CBA-328	FTC Foreign Branch Creditable Taxes	0	24,778	(5,879,520)
CBA-329	FTC Passive Basket Creditable Taxes	0	6,203,584	0
Total Adjustments This Page		N/A	N/A	N/A

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

Page 8

Main Worksheet - Input

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
CONTROLLED GROUP:			
Member of Controlled Group	Yes	Yes	Yes
REGULAR TAXABLE INCOME:			
Total Income	39,418,949,164	55,197,092,969	71,862,140,956
Total Deductions Except S199	12,031,089,355	17,339,205,915	20,663,815,328
TI Before NOL/Special Deductions	27,387,859,809	37,857,887,054	51,198,325,628
Less: NOL Deduction	35,555,565	32,256,491	10,968,272
Special Deductions	0	7,734,211,581	11,581,809,667
Taxable Income Before S199	27,352,304,244	30,091,418,982	39,605,547,689
Less: Section 199 Deduction (2005-2017)	0	n/a	n/a
Add: Other Taxable Income	0	0	0
Regular Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
REGULAR INCOME TAX & MINIMUM TAX:			
Federal Income Tax Before Adjust	9,573,306,485	6,319,197,986	8,317,165,015
Adjustment to Federal Income Tax	0	0	265,609
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Pre-2018 Alternative Minimum Tax	0	n/a	n/a
Post-2022 Alternative Minimum Tax	n/a	n/a	n/a
Base Erosion Minimum Tax Amount	n/a	0	0
Federal Income Tax Plus Minimum Tax	9,573,306,485	6,319,197,986	8,317,430,624
CREDITS:			
Foreign Tax Credit	195,952,418	291,870,895	370,869,670
Other Subpart B Credits	0	0	0
General Business Credit	565,680,537	264,805,294	445,271,113
Minimum Tax Credit/Bond Credits	54,883,684	0	0
OTHER TAXES:			
Other Taxes & Interest	0	0	58,225
TCJA S965 Transition Tax: Net Tax Liab (2017)	2,852,755,615	n/a	n/a
FEDERAL BALANCE DUE:			
Federal Total Tax	11,609,545,461	5,762,521,797	7,501,348,066
Net S965 Tax Liability Paid (2018-2025)	n/a	0	0
Less: Payments, Credits, & Net 965 Tax Liab	3,853,511,630	1,845,610,578	3,283,036,510
Plus: Estimated Tax Penalty	0	0	0
Federal Balance Due	7,756,033,831	3,916,911,219	4,218,311,556

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

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Pre-2018 AMT Main Worksheet - Input

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	n/a	n/a
PRE-2018 ALT MIN TAXABLE INCOME:			
Taxable Income Before S199	27,352,304,244	n/a	n/a
Add: Regular NOL Deduction	35,555,565	n/a	n/a
TI Before Regular NOL	27,387,859,809	n/a	n/a
Add: Adjustments/Preference Items Before S199	(119,518,893)	n/a	n/a
Preadjustment AMTI	27,268,340,916	n/a	n/a
Pre-2018 ACE Adjustment	0	n/a	n/a
Pre-2018 AMTI Before Energy/NOL	27,268,340,916	n/a	n/a
Less: Energy Deduction (1991-1992)	n/a	n/a	n/a
AMT NOL Deduction	35,555,595	n/a	n/a
AMTI Before Section 199 Deduction	27,232,785,321	n/a	n/a
Less: S199 Deduction for AMTI (2005-2017)	0	n/a	n/a
Pre-2018 AMTI Before Other	27,232,785,321	n/a	n/a
Add: Other AMTI	0	n/a	n/a
Pre-2018 Alternative Minimum Taxable Income	27,232,785,321	n/a	n/a
PRE-2018 ALTERNATIVE MINIMUM TAX:			
Pre-Credit TMT	5,446,557,064	n/a	n/a
Pre-2018 AMT Foreign Tax Credit	90,580,827	n/a	n/a
Pre-2018 Tentative Minimum Tax	5,355,976,237	n/a	n/a
Regular Tax After FTC	9,377,354,067	n/a	n/a
Pre-2018 AMT Before Adjustment	0	n/a	n/a
Adjustment to AMT	0	n/a	n/a
Pre-2018 Alternative Minimum Tax	0	n/a	n/a
MTC TO NEXT YEAR:			
MTC to Next Year Before Adjust	0	n/a	n/a
Adjustment to MTC	0	0	n/a
MTC Carried to Next Year	0	n/a	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

Increase/Decrease FTC COs/CBs Input - Category 1 General Limitation Income

Year Ending for FTC Category 1	12-31-2017 4: AIAAdj	12-31-2018 4: AIAAdj	12-31-2019 4: AIAAdj
CARRYBACKS FROM THIS YEAR:			
Increase/Decrease FTC Carryback	0	42,879,800	0
Increase/Decrease Foreign NOL CB	0	0	0
CARRYOVERS TO THIS YEAR:			
Increase/Decrease ODL Account at Beg of Year			
Remaining to be Recaptured	0	0	0
Pre-2018 Portion Remaining to be Recaptured	0	0	0
Increase/Decrease OFL Account at Beg of Year			
Remaining to be Recaptured	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

Page 11

Increase/Decrease FTC COs/CBs Input - Category 4: Foreign Branch Income

Year Ending for FTC Category 4:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
CARRYBACKS FROM THIS YEAR:			
Increase/Decrease FTC Carryback	0	(42,879,800)	0
Increase/Decrease Foreign NOL CB	0	0	0
CARRYOVERS TO THIS YEAR:			
Increase/Decrease ODL Account at Beg of Year:			
Remaining to be Recaptured	0	0	0
Pre-2018 Portion Remaining to be Recaptured	0	0	0
Increase/Decrease OFL Account at Beg of Year:			
Remaining to be Recaptured	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-2019
EP

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Federal Total Tax			
Year Ending	12-31-2017 4 AIAAdj	12-31-2018 4 AIAAdj	12-31-2019 4 AIAAdj
TAXABLE INCOME:			
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
FEDERAL INCOME TAX:			
Income Tax	9,573,306,485	6,319,197,986	8,317,165,015
Alternative Capital Gains Tax	n/a	n/a	n/a
Income Tax Before Adjustment	9,573,306,485	6,319,197,986	8,317,165,015
Adjustment to Fed Inc Tax	0	0	265,609
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
FEDERAL TOTAL TAX:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Pre-2018 Alternative Minimum Tax	0	n/a	n/a
Post-2022 Alternative Minimum Tax	n/a	n/a	n/a
Base Erosion Minimum Tax Amount	n/a	0	0
Federal Income Tax Plus Minimum Tax	9,573,306,485	6,319,197,986	8,317,430,624
Less: Foreign Tax Credit	195,952,418	291,870,895	370,869,670
Other Subpart B Credits	0	0	0
General Business Credit	585,680,537	264,805,294	445,271,113
Min Tax Credit/Bond Credits	54,883,684	0	0
Plus: Other Taxes & Interest	0	0	58,225
Federal Total Tax	11,609,545,461	5,762,521,797	7,901,348,066

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

Page 13

Tax by Brackets

Year Ending	12-31-2017 4 ABAAdj	12-31-2018 4 AIAAdj	12-31-2019 4 ABAAdj
SPECIAL CORPORATIONS:			
Member of Controlled Group (Y/N)	Yes	Yes	Yes
Pre-2018 PSC Flat Tax Applies (Y/N)	No	n/a	n/a
TAXABLE INCOME:			
TIPartial TI Before Annualization Short Year	27,352,304,244	30,091,418,982	39,605,547,689
Annualization Applies (Y/N)	n/a	n/a	n/a
Annualization Factor	n/a	n/a	n/a
TIPartial TI After Annualization	27,352,304,244	30,091,418,982	39,605,547,689
TAX POST-2017:			
21% Post-2017 Tax	n/a	6,319,197,986	8,317,165,015
Post-2017 Fraction	n/a	n/a	n/a
Prorated Post-2017 Tax	n/a	6,319,197,986	8,317,165,015
TAX 1993-2017:			
15% 1st 50,000	7,500	n/a	n/a
25% Next 25,000	6,250	n/a	n/a
34% Next 9,925,000	3,374,500	n/a	n/a
35% Over 10,000,000	9,569,806,485	n/a	n/a
Additional 5% Tax	11,750	n/a	n/a
Additional 3% Tax	100,000	n/a	n/a
Total 1993-2017 Tax	9,573,306,485	n/a	n/a
1993-2017 Fraction	n/a	n/a	n/a
Prorated 1993-2017 Tax	9,573,306,485	n/a	n/a
INCOME TAX:			
Total Prorated Taxes Short Year:	9,573,306,485	6,319,197,986	8,317,165,015
Un-Annualization Factor	n/a	n/a	n/a
General Method Tax	n/a	n/a	n/a
Optional Method Tax	n/a	n/a	n/a
Income Tax/Partial Tax	9,573,306,485	6,319,197,986	8,317,165,015

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Total Nonrefundable Credits Allowed			
Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
FOREIGN TAX CREDIT:			
Foreign Tax Credit	195,952,418	291,870,895	370,869,670
STANDARD GBC COMPONENTS:			
Research (S41)			
Research Credit	565,191,867	262,704,818	445,141,745
Alternative Fuel Vehicle Refueling Credit (S30C)	141,036	0	129,368
TOTAL STANDARD GBC ALLOWED:			
Total Standard GBC Allowed	565,332,903	262,704,818	445,271,113
Less: Refundable Standard GBC Allowed	n/a	n/a	n/a
Nonrefundable Standard GBC Allowed	565,332,903	262,704,818	445,271,113
GBC SPECIFIED CREDITS ALLOWED (S38(c)(4)):			
Rehabilitation Credit (Post-2007) (S47)	347,634	0	0
Energy Credit (Post-10/3/2008) (S48)	0	2,100,476	0
Total Specified Credits Allowed	347,634	2,100,476	0
TOTAL GENERAL BUSINESS CREDIT ALLOWED:			
Total GBC Before Adjustment	565,680,537	264,805,294	445,271,113
Adjustment to Total GBC	0	0	0
Total General Business Credit Allowed	565,680,537	264,805,294	445,271,113
MINIMUM TAX CREDIT ALLOWED:			
Minimum Tax Credit Allowed This Year	54,883,684	0	n/a
Less: Refundable Minimum Tax Credit	n/a	0	0
Nonrefundable Minimum Tax Credit	54,883,684	0	n/a
MINIMUM TAX CREDIT/BOND CREDITS ALLOWED:			
Nonrefundable MTC/Bond Credits	54,883,684	0	0
TOTAL CREDITS ALLOWED:			
Total Nonrefundable Credits	816,516,639	556,676,189	816,140,783

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Taxable Income			
Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
INCOME:			
Gross Income-Ordinary	39,456,747,848	55,173,244,921	71,968,895,485
Capital Gain Before CO/CB	0	0	0
Less: Capital Loss Carryovers	0	0	0
Capital Loss Carrybacks	0	0	0
Ordinary Gain/Loss	(37,798,684)	23,848,048	(106,754,529)
Passive Income/Loss Allowed	0	0	0
Total Income	39,418,949,164	55,197,092,969	71,862,140,956
DEDUCTIONS:			
Charitable Contributions Deduction	34,162,902	67,240,093	78,386,305
Interest Expense Deduction	4,489,902	4,750,093	6,290,041
Additional Deductions Except S199	11,992,436,551	17,267,215,729	20,579,138,982
Total Deductions Except S199	12,031,089,355	17,339,205,915	20,663,815,328
TAXABLE INCOME:			
TI Before NOL/D/Special Deductions	27,387,859,809	37,857,887,054	51,198,325,628
Less: NOL Deduction	35,555,565	32,256,491	10,968,272
Dividends-Received Deduction	0	7,734,211,581	11,581,809,667
TCJA 2017 S965 Deduction Amount	n/a	0	0
Dividends Paid Deduction	0	0	0
Taxable Income Before S199	27,352,304,244	n/a	n/a
Less: Section 199 Deduction (2005-2017)	0	n/a	n/a
Taxable Income Before Other	27,352,304,244	30,091,418,982	39,605,547,689
Add: Other Taxable Income	0	0	0
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689

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Interest Expense Deduction

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
INTEREST LIMITATION APPLIES:			
S163(j) Post-2017 Limit Applies (Y/N)	n/a	Yes	Yes
INTEREST EXPENSE:			
Business Interest Expense (BIE):			
Current Business Interest Expense	4,489,902	4,750,093	6,290,041
Carryforwards from Previous Years	n/a	0	0
Partner's Excess Interest Expense	n/a	0	0
Floor Plan Financing Interest Exp	0	0	0
Total Business Interest Expense	4,489,902	4,750,093	6,290,041
ADJUSTED TAXABLE INCOME (ATI):			
Adjusted Taxable Income Before Add/Sub	n/a	37,925,127,147	51,276,711,933
Additions to ATI:			
Not Trade/Business: Deduction/Loss (No Int Exp)	n/a	0	0
Not Trade/Business: Interest Expense	n/a	0	0
Business Interest Expense Before S163(j)	n/a	4,750,093	6,290,041
Net Operating Loss Deduction (n/a)	n/a	n/a	n/a
Pre-2022 Total Depreciation, Depl, Amort	n/a	7,333,911,465	9,388,364,531
Deduction/Loss from Pass-Through	n/a	9,184,878	20,547,946
P/S NOT Subject to S163(j): Partner's ATI	n/a	0	0
Capital Loss Carryover/Carryback (n/a)	n/a	n/a	n/a
Other Additions	n/a	0	463,649
P/S Subject to S163(j): Partner's ETI	n/a	0	0
Total Additions to ATI	n/a	7,347,846,436	9,415,666,167
Subtractions from ATI			
Not Trade/Business: Income or Gain	n/a	0	0
Current Business Interest Income (BI)	n/a	447,378,815	684,333,830
Income/Gain from Pass-Through	n/a	0	375,451
Floor Plan Financing Interest Expense	n/a	0	0
Other Subtractions	n/a	7,816,154,934	88,198
Total Subtractions from ATI	n/a	8,263,533,749	684,797,479
Adjusted Taxable Income:			
Eject 2019 ATI for 2020 (Y/N)	n/a	n/a	n/a
Adjusted Taxable Income Before Add/Sub	n/a	37,925,127,147	51,276,711,933
Add: Total Additions to ATI	n/a	7,347,846,436	9,415,666,167
Less: Total Subtractions from ATI	n/a	8,263,533,749	684,797,479
ATI Before CCD	n/a	37,009,439,834	60,007,580,621
Less: ATI Charitable Contributions Deduction	n/a	67,240,093	78,386,305
ATI Before Special Deductions	n/a	36,942,199,741	59,929,194,316
Less: ATI Special Deductions	n/a	7,734,211,581	11,581,809,667
Add: Other Taxable Income	n/a	0	0
ATI Before Increase/Decrease	n/a	29,207,988,160	48,347,384,649
ATI Increase/Decrease	n/a	0	0
Adjusted Taxable Income (ATI)	n/a	29,207,988,160	48,347,384,649
BUSINESS INTEREST INCOME (BI)			
Current Business Interest Income	n/a	447,378,815	684,333,830
P/S NOT Subject to S163(j) Partner's BI	n/a	0	0
Partner's Excess Interest Income	n/a	0	0
Total Business Interest Income	n/a	447,378,815	684,333,830

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Interest Expense Deduction

Year Ending:	12-31-2017 4: AIIAdj	12-31-2018 4: AIIAdj	12-31-2019 4: AIIAdj
BUSINESS INTEREST EXPENSE LIMITATION:			
Elect 30% for 2019-2020 (Y/N)	n/a	n/a	No
ATI Percentage (30% or 50%)	n/a	30	50
Percentage X ATI	n/a	8,762,396,448	24,173,692,325
Total Business Interest Income	n/a	447,378,815	684,333,830
Floor Plan Financing Interest	n/a	0	0
Limitation Before Increase/Decrease	n/a	9,209,775,263	24,858,026,155
Increase/Decrease Limitation	n/a	0	0
Interest Expense Limitation	n/a	9,209,775,263	24,858,026,155
INTEREST EXPENSE DEDUCTION:			
Business Interest Expense Allowed	n/a	4,750,093	6,290,041
Partner 50% of 2019 Excess BIE	n/a	n/a	n/a
Not Trade/Business Interest Expense	n/a	0	0
Increase/Decrease	n/a	0	0
Interest Expense Deduction	4,489,902	4,750,093	6,290,041
BUSINESS INTEREST EXPENSE CARRYFORWARD:			
Carryforward to Next Year	n/a	0	0

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S163(j) Adjusted Taxable Income

Year Ending:	12-31-2017 4. AllAdj	12-31-2018 4. AllAdj	12-31-2019 4. AllAdj
INTEREST LIMITATION APPLIES:			
Post-2017 Limitation Applies (Y/N)	n/a	Yes	Yes
ATI BEFORE ADDITIONS/SUBTRACTIONS:			
ATI Income Before Add/Sub:			
Gross Profit	n/a	18,727,540,890	21,942,540,363
Dividends and Inclusions	n/a	15,737,475,541	23,451,587,914
Business Interest Income (Bill)	n/a	447,378,815	684,333,830
Gross Rents	n/a	5,119,033	13,369,945
Gross Royalties	n/a	15,421,994,223	18,968,553,423
Other Income	n/a	4,833,736,419	6,909,134,559
Capital Gain Before CO/CB	n/a	0	0
Ordinary Gain/Loss	n/a	23,848,048	(106,754,529)
Income/Gain from Pass-Through	n/a	0	375,451
ATI Total Income Before Add/Sub	n/a	55,197,092,969	71,862,140,956
ATI Deductions Before Add/Sub:			
Net Officer Compensation	n/a	621,232,477	335,537,492
Net Salaries and Wages	n/a	9,736,033,320	12,308,197,963
Repairs and Maintenance	n/a	215,372,145	274,246,956
Bad Debts	n/a	13,687,247	51,248,767
Rents	n/a	382,567,293	495,607,721
Taxes	n/a	734,904,099	1,097,410,229
Business Interest Expense Before S163(j)	n/a	4,750,093	6,290,041
Net Depreciation, Depletion, Amortization	n/a	1,476,204,506	2,272,748,393
Advertising	n/a	2,241,368,859	3,042,522,367
Pension, etc Plans	n/a	0	0
Employee Benefits	n/a	608,356,685	858,581,076
ATI Other Deductions	n/a	1,228,304,220	(177,509,928)
Deduction/Loss from Pass-Through	n/a	9,184,878	20,547,946
ATI Total Deductions Before Add/Sub	n/a	17,271,965,822	20,585,429,023
Adjusted Taxable Income Before Add/Sub:			
ATI Total Income Before Add/Sub	n/a	55,197,092,969	71,862,140,956
Less: ATI Total Deductions Before Add/Sub	n/a	17,271,965,822	20,585,429,023
Adjusted Taxable Income Before Add/Sub	n/a	37,925,127,147	51,276,711,933
ADDITIONS/SUBTRACTIONS:			
Additions to ATI			
Not Trade or Business Deduction/Loss	n/a	0	0
Not Trade or Business Interest Expense	n/a	0	0
Business Interest Expense Before S163(j)	n/a	4,750,093	6,290,041
Net Operating Loss Deduction (n/a)	n/a	n/a	n/a
Pre-2022 Total Depreciation, Depl, Amort	n/a	7,333,911,465	9,388,364,531
Deduction/Loss from Pass-Through	n/a	9,184,878	20,547,946
P/S NOT Subject to S163(j) Partner's ATI	n/a	0	0
Capital Loss Carryover/Carryback (n/a)	n/a	n/a	n/a
Other Additions	n/a	0	463,649
P/S Subject to S163(j) Partner's ETI	n/a	0	0
Total Additions to ATI	n/a	7,347,846,436	9,415,666,167
Subtractions from ATI			
Not Trade or Business Income/Gain	n/a	0	0

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S163(j) Adjusted Taxable Income

Year Ending:	12-31-2017 4. AllAdj	12-31-2018 4. AllAdj	12-31-2019 4. AllAdj
Current Business Interest Income (BII)	n/a	447,378,815	684,333,830
Income/Gain from Pass-Through	n/a	0	375,451
Floor Plan Financing Interest Expense	n/a	0	0
Other Subtractions	n/a	7,816,154,934	88,198
Total Subtractions from ATI	n/a	8,263,533,749	684,797,479
ADJUSTED TAXABLE INCOME:			
Adjusted Taxable Income Before Add/Sub	n/a	37,925,127,147	51,276,711,933
Add: Total Additions to ATI	n/a	7,347,846,436	9,415,666,167
Less: Total Subtractions from ATI	n/a	8,263,533,749	684,797,479
ATI Before CCD	n/a	37,009,439,834	60,007,580,621
Less: ATI Charitable Contributions Deduction	n/a	67,240,093	78,386,305
ATI Before Special Deductions	n/a	36,942,199,741	59,929,194,316
Less: ATI Special Deductions	n/a	7,734,211,581	11,581,809,667
Add: Other Taxable Income	n/a	0	0
ATI Before Increase/Decrease	n/a	29,207,988,160	48,347,384,649
ATI Increase/Decrease	n/a	0	0
Adjusted Taxable Income	n/a	29,207,988,160	48,347,384,649

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NOL Deduction (NOLD)

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
NOLS NOT SUBJECT TO 80% LIMIT:			
NOLs TO Pre-2021 Years:			
S382 Carryovers	0	0	0
Non-S382 Carryovers	35,555,565	32,256,491	10,968,272
Carrybacks	0	0	0
Total NOLs To Pre-2021 Years	35,555,565	32,256,491	10,968,272
NOLs From Pre-2018 To Post-2020:			
S382 Carryovers	0	0	0
Non-S382 Carryovers	0	0	0
Total NOLs From Pre-2018 To Post-2020	0	0	0
NOLS SUBJECT TO 80% LIMIT:			
80% NOLD LIMIT:			
Preliminary 80% NOLD Limit	0	0	0
Less: 80% NOLs From Pre-2018 To Post-2020	0	0	0
80% NOLD Limit	0	0	0
NOLs From Post-2017 To Post-2020:			
S382 Carryovers	0	0	0
Non-S382 Carryovers	0	0	0
Carrybacks	0	0	0
Total NOLs From Post-2017 To Post-2020	0	0	0
NOLs Allowed After 80% Limit	0	0	0
TOTAL NOL DEDUCTION:			
NOLs To Pre-2021 Years	35,555,565	32,256,491	10,968,272
NOLs From Pre-2018 To Post-2020	0	0	0
NOLs Allowed After 80% Limit	0	0	0
Total NOL Deduction (NOLD)	35,555,565	32,256,491	10,968,272

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GILTI Consolidated Amount

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
CONSOLIDATED TESTED INCOME/LOSS:			
Consolidated Tested Income	n/a	0	0
Consolidated Tested Loss	n/a	0	0
Sum of Net CFC Tested Income	n/a	0	0
CONSOLIDATED SPECIFIED INTEREST EXPENSE:			
Tested Interest Expense	n/a	0	0
Less: Tested Interest Income	n/a	0	0
Consolidated Specified Interest Expense	n/a	0	0
SUM OF NET DTIR:			
Consolidated QBAI	n/a	0	0
Sum of DTIR (10%)	n/a	0	0
Less: Consol Specified Interest Expense	n/a	0	0
Sum of Net DTIR	n/a	0	0
SUM OF GILTI INCLUSION AMOUNTS:			
Sum of Net CFC Tested Income	n/a	0	0
Less: Sum of Net DTIR	n/a	0	0
GILTI Inclusion Amount Before Incr/Decr	n/a	0	0
GILTI Increase/Decrease	n/a	15,136,047,646	22,703,223,744
Consolidated GILTI Inclusion Amount	n/a	15,136,047,646	22,703,223,744
GILTI S78 Gross-up	n/a	332,375,516	460,395,590
Total Consolidated GILTI	n/a	15,468,423,162	23,163,619,334

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S250 Deduction

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
TENTATIVE SECTION 250 DEDUCTION:			
Tentative S250 Ded Before Incr/Decr	n/a	7,734,211,581	11,581,809,667
Increase/Decrease	n/a	0	0
Tentative S250 Deduction	n/a	7,734,211,581	11,581,809,667
FINAL SECTION 250 DEDUCTION:			
GILTI:			
GILTI Inclusion Amount	n/a	15,136,047,646	22,703,223,744
GILTI S78 Gross-up	n/a	332,375,516	460,395,590
Final FDII:			
Consolidated Final FDII	n/a	0	0
S250(a)(2) Reduction:			
Entry:			
S250(a)(2) Reduction (Entry)	n/a	0	0
Calculated:			
Final FDII + GILTI Inclusion Amount	n/a	15,136,047,646	22,703,223,744
Less TI For Final S250 Deduct	n/a	37,825,630,563	51,187,357,356
S250(a)(2) Reduction Before Incr/Decr	n/a	0	0
Increase/Decrease	n/a	0	0
S250(a)(2) Reduction (Calculated)	n/a	0	0
Select Calculated S250(a)(2) (Y/N)	n/a	No	No
S250(a)(2) Reduction	n/a	0	0
Final FDII Deduction:			
Consolidated Final FDII	n/a	0	0
FDII Reduction	n/a	0	0
Reduced FDII	n/a	0	0
FDII Deduction Rate	n/a	.375	.375
FDII Deduction	n/a	0	0
Final GILTI Deduction:			
GILTI Inclusion Amount	n/a	15,136,047,646	22,703,223,744
GILTI Reduction	n/a	0	0
Reduced GILTI	n/a	15,136,047,646	22,703,223,744
GILTI S78 Gross-up	n/a	332,375,516	460,395,590
Total GILTI for Deduction	n/a	15,468,423,162	23,163,619,334
GILTI Deduction Rate	n/a	.5	.5
GILTI Deduction	n/a	7,734,211,581	11,581,809,667
Final S250 Deduction:			
S250 Deduction Before Incr/Decr	n/a	7,734,211,581	11,581,809,667
Increase/Decrease	n/a	0	0
Final S250 Deduction Before S246(b)	n/a	7,734,211,581	11,581,809,667

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Taxable Income for Final S250 Deduction (Post-2017)

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
INCOME:			
Gross Income-Ordinary	n/a	55,173,244.921	71,968,895.485
Capital Gain Before CO/CE	n/a	0	0
Less: Capital Loss Carryovers	n/a	0	0
Capital Loss Carrybacks	n/a	0	0
Ordinary Gain/Loss	n/a	23,848,048	(106,754,529)
Passive Income/Loss Allowed	n/a	0	0
Total Income	n/a	55,197,092.969	71,862,140.956
DEDUCTIONS:			
Charitable Contributions Deduction	n/a	67,240,093	78,386,305
Interest Expense Deduction	n/a	4,750,093	6,290,041
Additional Deductions	n/a	17,267,215.729	20,579,138.982
Total Deductions	n/a	17,339,205.915	20,663,815.328
TAXABLE INCOME:			
TI Before NOL/Special Deductions	n/a	37,857,887.054	51,198,325.628
Less: NOL Deduction	n/a	32,256,491	10,968,272
DRD Without S250	n/a	0	0
TCJA 2017 S965 Deduction Amount	n/a	0	0
DPD Without S250	n/a	0	0
TI for S250 Deduction	n/a	37,825,630.563	51,187,357.356

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Pre-2018 Alternative Minimum Taxable Income

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	n/a	n/a
PREADJUSTMENT PRE-2018 AMTI:			
Regular Taxable Income Before S199	27,352,304,244	n/a	n/a
Add: Regular NOL Deduction	35,555,585	n/a	n/a
Taxable Income Before Regular NOLD	27,387,859,809	n/a	n/a
Add: Adjustments/Preference Items Before S199	(119,518,893)	n/a	n/a
Preadjustment Pre-2018 AMTI	27,268,340,916	n/a	n/a
ADJUSTMENTS:			
Pre-2018 ACE Adjustment	0	n/a	n/a
Pre-2018 AMTI Before AMT NOLD	27,268,340,916	n/a	n/a
PRE-2018 AMT NET OPERATING LOSS:			
S382 Pre-2018 AMT NOL COs Allowed	0	n/a	n/a
Non-S382 Pre-2018 AMT NOL Carryovers	35,555,595	n/a	n/a
Pre-2018 AMT NOL Carrybacks	0	n/a	n/a
Pre-2018 AMT NOLD Limitation	35,555,595	n/a	n/a
Pre-2018 AMT NOL Deduction	35,555,595	n/a	n/a
PRE-2018 ALTERNATIVE MINIMUM TAXABLE INCOME:			
Pre-2018 AMTI Before Section 199 Deduction	27,232,785,321	n/a	n/a
Less: S199 Deduction for Pre-2018 AMTI	0	n/a	n/a
Pre-2018 AMTI Before Other	27,232,785,321	n/a	n/a
Add: Other Pre-2018 AMTI	0	n/a	n/a
Pre-2018 Alternative Minimum Taxable Income	27,232,785,321	n/a	n/a

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Pre-2018 AMT NOLD Limitation

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
AMTI BEFORE AMT NOLD:			
AMTI Before AMT NOLD	27,268,340,916	n/a	n/a
AMT NOL CARRYOVERS:			
Specific Carryovers:			
AMT NOL COs from 2008-09:			
S172(b)(1)(H) Election	0	n/a	n/a
AMT NOL COs to 2001-02	0	n/a	n/a
AMT Qualified Disaster Loss COs	0	n/a	n/a
Other Carryovers:			
S382 AMT NOL Carryovers Allowed	0	n/a	n/a
Other Non-S382 AMT NOL Carryovers	35,555,595	n/a	n/a
Total AMT NOL Carryovers	0	n/a	n/a
AMT NOL CARRYBACKS:			
Specific Carrybacks:			
AMT NOL CBs from 2008-09:			
S172(b)(1)(H) Election	0	n/a	n/a
AMT NOL CBs from 2001-02	0	n/a	n/a
AMT Qualified Disaster Loss CBs	0	n/a	n/a
Other AMT NOL Carrybacks	0	n/a	n/a
Total AMT NOL Carrybacks	0	n/a	n/a
AMT NOLD LIMITATION:			
Basic AMT NOLD Limitation:			
Other AMT NOL Carryovers/Carrybacks	35,555,595	n/a	n/a
90% x AMTI Before AMT NOLD	24,541,506,824	n/a	n/a
Lesser: Basic AMT NOLD Limitation	35,555,595	n/a	n/a
Bonus AMT NOLD Limitation			
Specific AMT NOL Carryovers/Carrybacks	0	n/a	n/a
AMTI Less Basic Limit	27,232,785,321	n/a	n/a
Lesser: Bonus AMT NOLD Limitation	0	n/a	n/a
Adjustment to AMT NOLD Limitation	0	n/a	n/a
Total AMT NOLD Limitation	35,555,595	n/a	n/a

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Summary of FTC Allowed

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
FTC ALLOWED:			
Cat 1: General Limitation Income	195,696,506	22,437,297	0
Cat 2: Passive Income	255,912	3,533,186	411,017
Cat 3: Section 951A Income	0	265,900,412	368,316,469
Cat 5: Treaty Resourced Income: IS	0	0	2,142,184
Total FTC Before Boycott	195,952,418	291,870,895	370,869,670
Add: Adjustment	0	0	0
Less: Boycott Reduction	0	0	0
Total FTC Allowed	195,952,418	291,870,895	370,869,670
DIVIDEND GROSS-UP FROM CATEGORIES (S78):			
Cat 1: General Limitation Income	9,072,806	10,785,260	13,390,498
Cat 2: Passive Income	255,912	7,555,307	8,999,043
Total Gross-up from Categories	9,328,718	18,340,567	22,389,541

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FTC Allowed - Category 1: General Limitation Income

Year Ending for FTC Category 1:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
FTC AVAILABLE:			
Current FTC	90,324,915	84,929,088	140,887,228
FTC Carryover	0	0	0
FTC Carryback	105,371,591	140,887,228	0
Total FTC Available	195,696,506	225,816,316	140,887,228
FTC FRACTION:			
Numerator:			
Numerator Before Increase	5,236,302,029	106,844,270	0
Increase	n/a	0	0
Numerator of Fraction	5,236,302,029	106,844,270	0
Denominator:			
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	30,091,418,982	39,605,547,689
Limitation Fraction	.191439156	.00355065575551	0
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Add: Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less: Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	6,319,197,986	8,317,430,624
FTC LIMITATION:			
Section 904 Limitation	1,832,705,714	22,437,297	0
Limitation Adjustment	0	0	0
FTC Limitation	1,832,705,714	22,437,297	0
FTC ALLOWED:			
FTC Allowed Before Adjustment	195,696,506	22,437,297	0
Adjustment to FTC Allowed	0	0	0
FTC Allowed	195,696,506	22,437,297	0
EXCESS FTC:			
Excess FTC Available	0	203,379,019	140,887,228
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	1,637,009,208	0	0

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FTC Allowed - Category 2: Passive Income

Year Ending for FTC Category 2	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
FTC AVAILABLE:			
Current FTC	255,912	3,533,186	411,017
FTC Carryover	0	0	0
FTC Carryback	0	0	0
Total FTC Available	255,912	3,533,186	411,017
FTC FRACTION:			
Numerator:			
Numerator Before Increase	136,576,151	17,682,146	14,119,525
Increase	n/a	0	0
Numerator of Fraction	136,576,151	17,682,146	14,119,525
Denominator:			
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	30,091,418,982	39,605,547,689
Limitation Fraction	004993223	.00058761423017	.0003565037179
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Add: Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less: Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	6,319,197,986	8,317,430,624
FTC LIMITATION:			
Section 904 Limitation	47,801,654	3,713,251	2,965,195
Limitation Adjustment	0	0	0
FTC Limitation	47,801,654	3,713,251	2,965,195
FTC ALLOWED:			
FTC Allowed Before Adjustment	255,912	3,533,186	411,017
Adjustment to FTC Allowed	0	0	0
FTC Allowed	255,912	3,533,186	411,017
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	47,545,742	180,065	2,554,178

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FTC Allowed - Category 3 Section 951A Income

Year Ending for FTC Category 3	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
FTC AVAILABLE:			
Current FTC	0	265,900,412	368,316,469
FTC Carryover	0	0	0
FTC Carryback	0	0	0
Total FTC Available	0	265,900,412	368,316,469
FTC FRACTION			
Numerator:			
Numerator Before Increase	0	7,456,860,698	10,967,645,368
Increase	n/a	0	0
Numerator of Fraction	0	7,456,860,698	10,967,645,368
Denominator:			
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	30,091,418,982	39,605,547,689
Limitation Fraction	0	24780688150534	2769219467465
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Add. Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	6,319,197,986	8,317,430,624
FTC LIMITATION:			
Section 904 Limitation	0	1,565,940,747	2,303,279,080
Limitation Adjustment	0	0	0
FTC Limitation	0	1,565,940,747	2,303,279,080
FTC ALLOWED:			
FTC Allowed Before Adjustment	0	265,900,412	368,316,469
Adjustment to FTC Allowed	0	0	0
FTC Allowed	0	265,900,412	368,316,469
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	0	1,300,040,335	1,934,962,611

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FTC Allowed - Category 4: Foreign Branch Income

Year Ending for FTC Category 4	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
FTC AVAILABLE:			
Current FTC	0	42,879,800	56,473,720
FTC Carryover	0	0	0
FTC Carryback	0	56,473,720	0
Total FTC Available	0	99,353,520	56,473,720
FTC FRACTION:			
Numerator:			
Numerator Before Increase	0	0	0
Increase	n/a	0	0
Numerator of Fraction	0	0	0
Denominator:			
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	30,091,418,982	39,605,547,689
Limitation Fraction	0	0	0
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Add Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	6,319,197,986	8,317,430,624
FTC LIMITATION:			
Section 904 Limitation	0	0	0
Limitation Adjustment	0	0	0
FTC Limitation	0	0	0
FTC ALLOWED:			
FTC Allowed Before Adjustment	0	0	0
Adjustment to FTC Allowed	0	0	0
FTC Allowed	0	0	0
EXCESS FTC:			
Excess FTC Available	0	99,353,520	56,473,720
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	0	0	0

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FTC Allowed - Category 5: Treaty Resourced Income IS

Year Ending for FTC Category 5:	12-31-2017 4: AIAAdj	12-31-2018 4: AIAAdj	12-31-2019 4: AIAAdj
FTC AVAILABLE:			
Current FTC	0	0	2,142,184
FTC Carryover	0	0	0
FTC Carryback	0	0	0
Total FTC Available	0	0	2,142,184
FTC FRACTION:			
Numerator:			
Numerator Before Increase	0	0	38,477,038
Increase	n/a	0	0
Numerator of Fraction	0	0	38,477,038
Denominator:			
Taxable Income	27,352,304,244	30,091,418,982	39,605,547,689
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	30,091,418,982	39,605,547,689
Limitation Fraction	0	0	.0009715062724
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Add Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	6,319,197,986	8,317,430,624
FTC LIMITATION:			
Section 904 Limitation	0	0	8,080,436
Limitation Adjustment	0	0	0
FTC Limitation	0	0	8,080,436
FTC ALLOWED:			
FTC Allowed Before Adjustment	0	0	2,142,184
Adjustment to FTC Allowed	0	0	0
FTC Allowed	0	0	2,142,184
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	0	0	5,938,252

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FTC Carryovers/Carrybacks - Cat 1 General Limitation Income

Year Ending for FTC Category 1	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
FTC Carryovers	0	0	0
FTC Carrybacks from:			
12-31-2018	105,371,591	n/a	n/a
12-31-2019	0	140,887,228	n/a
FTC Carrybacks	105,371,591	140,887,228	0

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FTC Carryovers/Carrybacks - Cat 2 Passive Income

	12-31-2017 Year Ending for FTC Category 2: AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
FTC Carryovers	0	0	0
FTC Carrybacks	0	0	0

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----- FTC Carryovers/Carrybacks - Cat 3: Section 951A Income -----

	12-31-2017	12-31-2018	12-31-2019
Year Ending for FTC Category 3d: AllAdj	4: AllAdj	4: AllAdj	4: AllAdj
FTC Carryovers	n/a	n/a	n/a
FTC Carrybacks	n/a	n/a	n/a

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FTC Carryovers/Carrybacks - Cal 4. Foreign Branch Income

Year Ending for FTC Category 4	12-31-2017 4. AllAdj	12-31-2018 4. AllAdj	12-31-2019 4. AllAdj
FTC Carryovers	0	0	0
FTC Carrybacks from 12-31-2019	0	56,473,720	n/a
FTC Carrybacks	0	56,473,720	0

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FTC Carryovers/Carrybacks - Cat 5: Treaty Resourced Income: IS

	12-31-2017	12-31-2018	12-31-2019
Year Ending for FTC Category 5: A AAdj	4: A AAdj	4: A AAdj	4: A AAdj
FTC Carryovers	0	0	0
FTC Carrybacks	0	0	0

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FTC Absorbed - Category 1: General Limitation Income

Year Ending for FTC Category 1	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	n/a	n/a	0	0	0	0	0	0	0	0	0
CARRYBACKS:											
Balance Before Carryback Adjustment to Carryback Absorbed by Carryback to: 12-31-2017	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
CARRYOVERS:											
Balance Before Carryovers	n/a	n/a	0	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 1	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	0	90,324,915	84,929,088	140,887,228							
CARRYBACKS:											
Balance Before Carryback Adjustment to Carryback Absorbed by Carryback to: 12-31-2017	n/a	0	62,491,791	140,887,228							
CARRYOVERS:											
Balance Before Carryovers	n/a	0	42,879,800	0							
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	105,371,591	0							
	0	0	0	140,887,228							
	0	0	0	140,887,228							

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FTC Absorbed - Category 2: Passive Income

Year Ending for FTC Category 2.	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	n/a	n/a	0	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 2.	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	0	255,912	3,533,186	411,017							
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	0	0	0	0							
	0	0	0	0							

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FTC Absorbed - Category 3 Section 951A Income

Year Ending for FTC Category 3	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 3	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	n/a	0	265,900,412	368,316,469							
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	0	0	0							
	n/a	n/a	n/a	n/a							

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FTC Absorbed - Category 4 Foreign Branch Income

Year Ending for FTC Category 4	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current Foreign Tax Credit	n/a	n/a	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
CARRYBACKS:											
Balance Before Carryback	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Adjustment to Carryback	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
CARRYOVERS:											
Balance Before Carryovers	n/a	n/a	0	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:											
Expired	n/a	n/a	0	0	0	0	0	0	0	0	0
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 4	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current Foreign Tax Credit	0	0	42,879,800	56,473,720							
Absorbed in Current Year	n/a	0	0	0							
CARRYBACKS:											
Balance Before Carryback	n/a	0	42,879,800	56,473,720							
Adjustment to Carryback	n/a	0	(42,879,800)	0							
CARRYOVERS:											
Balance Before Carryovers	0	0	0	56,473,720							
EXPIRED/UNUSED:											
Expired	0	0	0	0							
Unused Foreign Tax Credit	0	0	0	56,473,720							

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FTC Absorbed - Category 5: Treaty Resourced Income IS

Year Ending for FTC Category 5:	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current Foreign Tax Credit	n/a	n/a	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired	n/a	n/a	0	0	0	0	0	0	0	0	0
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 5:	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current Foreign Tax Credit	0	0	0	2,142,184							
Absorbed in Current Year	n/a	0	0	2,142,184							
EXPIRED/UNUSED:											
Expired	0	0	0	0							
Unused Foreign Tax Credit	0	0	0	0							

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FTC: Numerator - Category 1 General Limitation Income

Year Ending for FTC Category 1.	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign Income or Loss	202,742,765	110,606,145	(6,364,156)
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	202,742,765	110,606,145	(6,364,156)
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	202,742,765	110,606,145	(6,364,156)
Allocate SLLs			
Cat 1 General Limitation Income	0	0	6,364,156
Cat 4 Foreign Branch Income	0	(3,761,875)	0
Subtotal B	202,742,765	106,844,270	0
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	202,742,765	106,844,270	0
Recapture OFLs	0	0	0
Subtotal D	202,742,765	106,844,270	0
Subtotal E	202,742,765	106,844,270	0
Recapture ODLs	5,033,559,264	0	0
Numerator Before Carryback	5,236,302,029	106,844,270	0
Increase/Decrease Due To			
NOL Carryback From			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	5,236,302,029	106,844,270	0

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FTC Numerator - Category 2 Passive Income

Year Ending for FTC Category 2.	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign Income or Loss	106,324,469	18,304,716	14,864,114
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	106,324,469	18,304,716	14,864,114
S904(b) - Allocate Excess Foreign CGMI	0	0	0
Subtotal A After S904(b)	106,324,469	18,304,716	14,864,114
Allocate S _L S:			
Cat 1: General Limitation Income	0	0	(8,154)
Cat 4: Foreign Branch Income	0	(522,570)	(736,435)
Subtotal B	106,324,469	17,682,146	14,119,525
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	106,324,469	17,682,146	14,119,525
Recapture OFLs	0	0	0
Subtotal D	106,324,469	17,682,146	14,119,525
Subtotal E	106,324,469	17,682,146	14,119,525
Recapture ODLs	30,251,682	0	0
Numerator Before Carryback	136,576,151	17,682,146	14,119,525
Increase/Decrease Due To NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	136,576,151	17,682,146	14,119,525

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FTC: Numerator - Category 3, Section 951A Income

Year Ending for FTC Category 3:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign Income or Loss	0	7,719,408,991	11,546,020,932
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	0	7,719,408,991	11,546,020,932
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	0	7,719,408,991	11,546,020,932
Allocate SLLs:			
Cat 1: General Limitation Income	0	0	(6,333,782)
Cat 4: Foreign Branch Income	0	(262,548,293)	(572,041,782)
Subtotal B	0	7,456,860,698	10,967,645,368
Allocate OFIs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	0	7,456,860,698	10,967,645,368
Recapture OFIs	0	0	0
Subtotal D	0	7,456,860,698	10,967,645,368
Subtotal E	0	7,456,860,698	10,967,645,368
Recapture ODLs	0	0	0
Numerator Before Carryback	0	7,456,860,698	10,967,645,368
Increase/Decrease Due To NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	0	7,456,860,698	10,967,645,368

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FTC Numerator - Category 4: Foreign Branch Income

Year Ending for FTC Category 4:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign Income or Loss	0	(266,932,738)	(574,785,072)
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	0	(266,932,738)	(574,785,072)
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	0	(266,932,738)	(574,785,072)
Allocate SLLs:			
Cat 4 Foreign Branch Income	0	266,932,738	574,785,072
Subtotal B	0	0	0
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	0	0	0
Recapture OFLs	0	0	0
Subtotal D	0	0	0
Subtotal E	0	0	0
Recapture ODLs	0	0	0
Numerator Before Carryback	0	0	0
Increase/Decrease Due To:			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	0	0	0

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FTC Numerator - Category 5, Treaty Resourced Income: IS

Year Ending for FTC Category 5:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign Income or Loss	0	0	40,506,113
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	0	0	40,506,113
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	0	0	40,506,113
Allocate SLLs			
Cat 1 General Limitation Income	0	0	(22,220)
Cat 4 Foreign Branch Income	0	0	(2,006,855)
Subtotal B	0	0	38,477,038
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	0	0	38,477,038
Recapture OFLs	0	0	0
Subtotal D	0	0	38,477,038
Subtotal E	0	0	38,477,038
Recapture ODLs	0	0	0
Numerator Before Carryback	0	0	38,477,038
Increase/Decrease Due To NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	0	0	38,477,038

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Year Ending:	FTC Denominator		
	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Taxable Income/NOL Generated	27,352,304,244	30,091,418,982	39,605,547,689
Add: NOL Deduction	35,555,565	32,256,491	10,968,272
US Income Increase/Decrease	0	0	0
Adjust for FTC Deducted	0	0	0
Less: Foreign Income/Loss	309,067,234	7,581,387,114	11,020,241,931
US Inc/Loss Before US NOL	27,078,792,575	22,542,288,359	28,596,274,030
Less: US NOL COs Utilized	35,555,565	32,256,491	10,968,272
US Source Income/Loss	27,043,237,010	22,510,031,868	28,585,305,758
US Source Income/Loss After S904(b)	27,043,237,010	22,510,031,868	28,585,305,758
US Subtotal A	27,043,237,010	22,510,031,868	28,585,305,758
US Subtotal B	27,043,237,010	22,510,031,868	28,585,305,758
Recapture ODLs:			
Cat 1: General Limitation Income	(5,033,559,264)	0	0
Cat 2: Passive Income	(30,251,682)	0	0
US Subtotal C	21,979,426,064	22,510,031,868	28,585,305,758
Increase/Decrease Due To			
NOL Carryback From			
1st Following Year	0	0	0
2nd Following Year	0	0	0
US Income/Loss	21,979,426,064	22,510,031,868	28,585,305,758
Sum of Numerators	5,372,878,180	7,581,387,114	11,020,241,931
Denominator of Limitation Fraction			
Denominator Before Increase	27,352,304,244	30,091,418,982	39,605,547,689
Increase Due to S904(b)(4)	0	0	0
Denominator After Increase	27,352,304,244	30,091,418,982	39,605,547,689

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FTC: Schedule J, Part I - 12-31-2017

FTC Categories for Year Ending 12-2017	Cat 1 4: AllAdj	Cat 2 4: AllAdj	Cat 3 4: AllAdj	Cat 4 4: AllAdj	Cat 5 4: AllAdj
Foreign Income or Loss	202,742,765	106,324,469	0	0	0
Less: Foreign NOL Carryover Utilized	0	0	0	0	0
Subtotal A	202,742,765	106,324,469	0	0	0
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0
Subtotal A After S904(b)	202,742,765	106,324,469	0	0	0
Subtotal B	202,742,765	106,324,469	0	0	0
Allocate OFLs	0	0	0	0	0
Allocate ODLs	0	0	0	0	0
Subtotal C	202,742,765	106,324,469	0	0	0
Recapture OFLs	0	0	0	0	0
Subtotal D	202,742,765	106,324,469	0	0	0
Subtotal E	202,742,765	106,324,469	0	0	0
Recapture ODLs	5,033,559,264	30,251,682	0	0	0
Numerator Before Carryback	5,236,302,029	136,576,151	0	0	0
Increase/Decrease Due To					
NOL Carryback From:					
1st Following Year	0	0	0	0	0
2nd Following Year	0	0	0	0	0
Numerator of Limit Fraction	5,236,302,029	136,576,151	0	0	0

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FTC Schedule J Part I - 12-31-2018

FTC Categories for Year Ending 12-2018	Cat 1 4 AllAdj	Cat 2 4 AllAdj	Cat 3 4 AllAdj	Cat 4 4 AllAdj	Cat 5 4 AllAdj
Foreign Income or Loss	110,606,145	18,304,716	7,719,408,991	(266,932,738)	0
Less: Foreign NOL Carryover Utilized	0	0	0	0	0
Subtotal A	110,606,145	18,304,716	7,719,408,991	(266,932,738)	0
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0
Subtotal A After S904(b)	110,606,145	18,304,716	7,719,408,991	(266,932,738)	0
Allocate SLLs:					
Cat 4: Foreign Branch Income	(3,761,875)	(622,570)	(262,548,293)	266,932,738	0
Subtotal B	106,844,270	17,682,146	7,456,860,698	0	0
Allocate OFLs	0	0	0	0	0
Allocate ODLs	0	0	0	0	0
Subtotal C	106,844,270	17,682,146	7,456,860,698	0	0
Recapture OFLs	0	0	0	0	0
Subtotal D	106,844,270	17,682,146	7,456,860,698	0	0
Subtotal E	106,844,270	17,682,146	7,456,860,698	0	0
Recapture ODLs	0	0	0	0	0
Numerator Before Carryback	106,844,270	17,682,146	7,456,860,698	0	0
Increase/Decrease Due To					
NOL Carryback From:					
1st Following Year	0	0	0	0	0
2nd Following Year	0	0	0	0	0
Numerator of Limit Fraction	106,844,270	17,682,146	7,456,860,698	0	0

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FTC: Schedule J, Part I - 12-31-2019

FTC Categories for Year Ending 12-2019:	Cat 1 4: AllAdj	Cat 2 4: AllAdj	Cat 3 4: AllAdj	Cat 4 4: AllAdj	Cat 5 4: AllAdj
Foreign Income or Loss	(6,364,156)	14,864,114	11,546,020,932	(574,785,072)	40,506,113
Less: Foreign NOL Carryover Utilized	0	0	0	0	0
Subtotal A	(6,364,156)	14,864,114	11,546,020,932	(574,785,072)	40,506,113
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0
Subtotal A After S904(b)	(6,364,156)	14,864,114	11,546,020,932	(574,785,072)	40,506,113
Allocate SLLs:					
Cat 1: General Limitation Income	6,364,156	(8,154)	(6,333,782)	0	(22,220)
Cat 4: Foreign Branch Income	0	(736,435)	(572,041,782)	574,785,072	(2,006,855)
Subtotal B	0	14,119,525	10,967,645,368	0	38,477,038
Allocate OFLs	0	0	0	0	0
Allocate ODLs	0	0	0	0	0
Subtotal C	0	14,119,525	10,967,645,368	0	38,477,038
Recapture OFLs	0	0	0	0	0
Subtotal D	0	14,119,525	10,967,645,368	0	38,477,038
Subtotal E	0	14,119,525	10,967,645,368	0	38,477,038
Recapture ODLs	0	0	0	0	0
Numerator Before Carryback	0	14,119,525	10,967,645,368	0	38,477,038
Increase/Decrease Due To					
NOL Carryback From:					
1st Following Year	0	0	0	0	0
2nd Following Year	0	0	0	0	0
Numerator of Limit Fraction	0	14,119,525	10,967,645,368	0	38,477,038

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FTC Losses to be Recaptured - Cat 1 General Limitation Income

Year Ending for FTC Category 1	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Separate Limitation Loss (SLL) Account at End of Year			
Cat 4: Foreign Branch Income	0	3,761,875	3,761,875
Overall Foreign Loss (OFL) Account			
OFL Beginning Balance			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	5,033,559,264	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	5,033,559,264	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	5,033,559,264	0	0
Less: Current Year Recapture	5,033,559,264	0	0
Bonus Recapture 2018-2027	n/a	0	0
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	5,033,559,264	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	5,033,559,264	0	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	5,033,559,264	0	0
Less: Pre-2018 Current Year Recapture	5,033,559,264	0	0
Pre-2018 Bonus Recapture 2018-2027	n/a	0	0
Pre-2018 ODL Ending Balance	0	0	0

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FTC Losses to be Recaptured - Cat 2: Passive Income

Year Ending for FTC Category 2:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Separate Limitation Loss (SLL)			
Account at End of Year			
Cat 1 General Limitation Income	0	0	8,154
Cat 4 Foreign Branch Income	0	622,570	1,359,005
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	30,251,682	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	30,251,682	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	30,251,682	0	0
Less: Current Year Recapture	30,251,682	0	0
Bonus Recapture 2018-2027	n/a	0	0
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	30,251,682	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	30,251,682	0	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	30,251,682	0	0
Less: Pre-2018 Current Year Recapture	30,251,682	0	0
Pre-2018 Bonus Recapture 2018-2027	n/a	0	0
Pre-2018 ODL Ending Balance	0	0	0

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FTC: Losses to be Recaptured - Cat 3: Section 951A Income

Year Ending for FTC Category 3:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Separate Limitation Loss (SLL) Account at End of Year:			
Cat 1: General Limitation Income	0	0	6,333,782
Cat 4: Foreign Branch Income	0	262,548,293	834,590,075
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
Bonus Recapture 2018-2027	n/a	0	0
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	0	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	0	0	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	0	0	0
Less: Pre-2018 Current Year Recapture	0	0	0
Pre-2018 Bonus Recapture 2018-2027	n/a	0	0
Pre-2018 ODL Ending Balance	0	0	0

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FTC Losses to be Recaptured - Cat 4: Foreign Branch Income

Year Ending for FTC Category 4:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
Bonus Recapture 2018-2027	n/a	0	0
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	0	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	0	0	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	0	0	0
Less: Pre-2018 Current Year Recapture	0	0	0
Pre-2018 Bonus Recapture 2018-2027	n/a	0	0
Pre-2018 ODL Ending Balance	0	0	0

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FTC Losses to be Recaptured - Cat 5: Treaty Resourced Income: IS

Year Ending for FTC Category 5:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Separate Limitation Loss (SLL) Account at End of Year			
Cat 1 General Limitation Income	0	0	22,220
Cat 4 Foreign Branch Income	0	0	2,006,855
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
Bonus Recapture 2018-2027	n/a	0	0
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	0	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	0	0	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	0	0	0
Less: Pre-2018 Current Year Recapture	0	0	0
Pre-2018 Bonus Recapture 2018-2027	n/a	0	0
Pre-2018 ODL Ending Balance	0	0	0

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FTC: Schedule J, Parts II-IV - 12-31-2017

FTC Categories for Year Ending 12-2017:	Cat 1 4: AllAdj	Cat 2 4: AllAdj	Cat 3 4: AllAdj	Cat 4 4: AllAdj	Cat 5 4: AllAdj
Overall Foreign Loss (OFL) Account:					
OFL Beginning Balance:					
Balance Before Adjustment	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	0	0	0	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
OFL Subtotal	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0
OFL Ending Balance	0	0	0	0	0
Overall Domestic Loss (ODL) Account:					
Beginning Balance					
Balance Before Adjustment	5,033,559,264	30,251,682	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	5,033,559,264	30,251,682	0	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
ODL Subtotal	5,033,559,264	30,251,682	0	0	0
Less: Current Year Recapture	5,033,559,264	30,251,682	0	0	0
Bonus Recapture 2018-2027	n/a	n/a	n/a	n/a	n/a
ODL Ending Balance	0	0	0	0	0
Pre-2018 Portion of ODL Account:					
Pre-2018 Beginning Balance:					
Pre-2018 Balance Before Adjustment	5,033,559,264	30,251,682	0	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0	0	0
Pre-2018 Beginning Balance	5,033,559,264	30,251,682	0	0	0
Pre-2018 Current Year Additions	0	0	0	0	0
Pre-2018 Current Year Reductions	0	0	0	0	0
Pre-2018 ODL Subtotal	5,033,559,264	30,251,682	0	0	0
Less: Pre-2018 Current Year Recapture	5,033,559,264	30,251,682	0	0	0
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	0	0	0	0	0

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FTC: Schedule J, Parts III-IV - 12-31-2018

FTC Categories for Year Ending 12-2018:	Cat 1 4: AllAdj	Cat 2 4: AllAdj	Cat 3 4: AllAdj	Cat 4 4: AllAdj	Cat 5 4: AllAdj
Separate Limitation Loss (SLL)					
Account at End of Year:					
Cat 4 Foreign Branch Income	3,761,875	622,570	262,548,293	n/a	0
Overall Foreign Loss (OFL) Account:					
OFL Beginning Balance:					
Balance Before Adjustment	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	0	0	0	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
OFL Subtotal	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0
OFL Ending Balance	0	0	0	0	0
Overall Domestic Loss (ODL) Account:					
Beginning Balance:					
Balance Before Adjustment	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	0	0	0	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
ODL Subtotal	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0
Bonus Recapture 2018-2027	0	0	0	0	0
ODL Ending Balance	0	0	0	0	0
Pre-2018 Portion of ODL Account:					
Pre-2018 Beginning Balance:					
Pre-2018 Balance Before Adjustment	0	0	0	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0	0	0
Pre-2018 Beginning Balance	0	0	0	0	0
Pre-2018 Current Year Additions	0	0	0	0	0
Pre-2018 Current Year Reductions	0	0	0	0	0
Pre-2018 ODL Subtotal	0	0	0	0	0
Less: Pre-2018 Current Year Recapture	0	0	0	0	0
Pre-2018 Bonus Recapture 2018-2027	0	0	0	0	0
Pre-2018 ODL Ending Balance	0	0	0	0	0

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FTC: Schedule J, Parts II-IV - 12-31-2019

FTC Categories for Year Ending 12-2019:	Cat 1 4: AllAdj	Cat 2 4: AllAdj	Cat 3 4: AllAdj	Cat 4 4: AllAdj	Cat 5 4: AllAdj
Separate Limitation Loss (SLL) Account at End of Year:					
Cat 1 General Limitation Income	n/a	8,154	6,333,782	0	22,220
Cat 4 Foreign Branch Income	3,761,875	1,359,005	834,590,075	n/a	2,006,855
Overall Foreign Loss (OFL) Account:					
OFL Beginning Balance:					
Balance Before Adjustment	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	0	0	0	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
OFL Subtotal	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0
OFL Ending Balance	0	0	0	0	0
Overall Domestic Loss (ODL) Account:					
Beginning Balance:					
Balance Before Adjustment	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	0	0	0	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
ODL Subtotal	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0
Bonus Recapture 2018-2027	0	0	0	0	0
ODL Ending Balance	0	0	0	0	0
Pre-2018 Portion of ODL Account:					
Pre-2018 Beginning Balance:					
Pre-2018 Balance Before Adjustment	0	0	0	0	0
Pre-2018 Adjustment to Beginning Balance	0	0	0	0	0
Pre-2018 Beginning Balance	0	0	0	0	0
Pre-2018 Current Year Additions	0	0	0	0	0
Pre-2018 Current Year Reductions	0	0	0	0	0
Pre-2018 ODL Subtotal	0	0	0	0	0
Less: Pre-2018 Current Year Recapture	0	0	0	0	0
Pre-2018 Bonus Recapture 2018-2027	0	0	0	0	0
Pre-2018 ODL Ending Balance	0	0	0	0	0

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FTC SLL Account at Beginning of Year - Cat 1 General Limitation Income

Year Ending for FTC Category 1	12-31-2017 4. AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
SLL Account Before Adjustment			
Cat 4: Foreign Branch Income	0	0	3,761,875
SLL Account After Adjustment			
Cat 4: Foreign Branch Income	0	0	3,761,875

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FTC: SLL Account at Beginning of Year - Cat 2, Passive Income

Year Ending for FTC Category 2	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
SLL Account Before Adjustment			
Cat 4, Foreign Branch Income	0	0	622,570
SLL Account After Adjustment			
Cat 4, Foreign Branch Income	0	0	622,570

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FTC SLL Account at Beginning of Year - Cat 3 Section 951A Income

Year Ending for FTC Category 3	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4: AllAdj
SLL Account Before Adjustment			
Cat 4 Foreign Branch Income	0	0	262,548,293
SLL Account After Adjustment			
Cat 4 Foreign Branch Income	0	0	262,548,293

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FTC: SLL Account at Beginning of Year 12-31-2019

FTC Categories for Year Ending 12-2019:	Cat 1 4: AllAdj	Cat 2 4: AllAdj	Cat 3 4: AllAdj	Cat 4 4: AllAdj	Cat 5 4: AllAdj
SLL Account Before Adjustment					
Cat 4: Foreign Branch Income	3,761,875	622,570	262,548,293	n/a	0
SLL Account After Adjustment					
Cat 4: Foreign Branch Income	3,761,875	622,570	262,548,293	n/a	0

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Summary of Pre-2018 AMT FTC Allowed

Year Ending:	12-31-2017 4: ABAAdj	12-31-2018 4: ABAAdj	12-31-2019 4: ABAAdj
AMT FTC ALLOWED:			
Cat 1: General Limitation Income	90,324,915	n/a	n/a
Cat 2: Passive Income	255,912	n/a	n/a
Total AMT FTC Before Adjustments	90,580,827	n/a	n/a
Add: Adjustment	0	n/a	n/a
Less: Boycott Reduction	0	n/a	n/a
Total AMT FTC Allowed	90,580,827	n/a	n/a
AMT FTC GROSS-UP FROM CATEGORIES (S78):			
Cat 1: General Limitation Income	9,072,806	n/a	n/a
Cat 2: Passive Income	255,912	n/a	n/a
Total AMT FTC Gross-up	9,328,718	n/a	n/a
Less: Total Regular FTC Gross-up	9,328,718	18,340,567	22,389,541

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Pre-2018 AMT FTC Allowed - Category 1: General Limitation Income

Year Ending for FTC Category 1	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
AMT FTC AVAILABLE:			
Current AMT FTC	90,324,915	n/a	n/a
AMT FTC Carryover	0	n/a	n/a
AMT FTC Carryback	0	n/a	n/a
Total AMT FTC Available	90,324,915	n/a	n/a
AMT FTC FRACTION:			
Numerator of Fraction	4,472,459,912	n/a	n/a
Alt Min Taxable Income	27,232,785,321	n/a	n/a
Adjustments	0	n/a	n/a
Denominator of Fraction	27,232,785,321	n/a	n/a
Limitation Fraction	.164230719	n/a	n/a
NET PRE-CREDIT TMT:			
Pre-Credit TMT	5,446,557,064	n/a	n/a
Add: TMT Adjustment	0	n/a	n/a
TMT on FTC Deducted	n/a	n/a	n/a
Net Pre-Credit TMT	5,446,557,064	n/a	n/a
AMT FTC LIMITATION:			
Section 904 Limitation	894,491,983	n/a	n/a
Limitation Adjustment	0	n/a	n/a
AMT FTC Limitation	894,491,983	n/a	n/a
AMT FTC ALLOWED BEFORE ADJUSTMENT:			
AMT FTC Before Overall Limitation	90,324,915	n/a	n/a
Less: Beyond Overall Limitation	0	n/a	n/a
AMT FTC Allowed Before Adjust	90,324,915	n/a	n/a
TOTAL AMT FTC ALLOWED:			
AMT FTC Allowed Before Adjust	90,324,915	n/a	n/a
Adjustment to AMT FTC Allowed	0	n/a	n/a
Total AMT FTC Allowed	90,324,915	n/a	n/a
EXCESS AMT FTC LIMITATION:			
Excess AMT FTC Available	0	n/a	n/a
Excess AMT FTC Limitation	804,167,068	n/a	n/a

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Pre-2018 AMT FTC Allowed - Category 2: Passive Income

Year Ending for FTC Category 2:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
AMT FTC AVAILABLE:			
Current AMT FTC	255,912	n/a	n/a
AMT FTC Carryover	0	n/a	n/a
AMT FTC Carryback	0	n/a	n/a
Total AMT FTC Available	255,912	n/a	n/a
AMT FTC FRACTION:			
Numerator of Fraction	132,055,734	n/a	n/a
Alt Min Taxable Income	27,232,785,321	n/a	n/a
Adjustments	0	n/a	n/a
Denominator of Fraction	27,232,785,321	n/a	n/a
Limitation Fraction	.004849145	n/a	n/a
NET PRE-CREDIT TMT:			
Pre-Credit TMT	5,448,557,064	n/a	n/a
Add TMT Adjustment	0	n/a	n/a
TMT on FTC Deducted	n/a	n/a	n/a
Net Pre-Credit TMT	5,448,557,064	n/a	n/a
AMT FTC LIMITATION:			
Section 904 Limitation	26,411,145	n/a	n/a
Limitation Adjustment	0	n/a	n/a
AMT FTC Limitation	26,411,145	n/a	n/a
AMT FTC ALLOWED BEFORE ADJUSTMENT:			
AMT FTC Before Overall Limitation	255,912	n/a	n/a
Less Beyond Overall Limitation	0	n/a	n/a
AMT FTC Allowed Before Adjust	255,912	n/a	n/a
TOTAL AMT FTC ALLOWED:			
AMT FTC Allowed Before Adjust	255,912	n/a	n/a
Adjustment to AMT FTC Allowed	0	n/a	n/a
Total AMT FTC Allowed	255,912	n/a	n/a
EXCESS AMT FTC/LIMITATION:			
Excess AMT FTC Available	0	n/a	n/a
Excess AMT FTC Limitation	26,155,233	n/a	n/a

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Pre-2018 AMT FTC Absorbed - Category 1 General Limitation Income											
Year Ending for FTC Category 1	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current AMT FTC	n/a	n/a	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired	n/a	n/a	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 1:	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current AMT FTC	0	90,324,915	n/a	n/a							
Absorbed in Current Year	n/a	90,324,915	n/a	n/a							
EXPIRED/UNUSED:											
Expired	0	0	0	0							
Unused AMT FTC	0	0	0	0							

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Pre-2018 AMT FTC Absorbed - Category 2: Passive Income

Year Ending for FTC Category 2:	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT:											
Current AMT FTC	n/a	n/a	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired	n/a	n/a	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 2:	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT:											
Current AMT FTC	0	255,912	n/a	n/a							
Absorbed in Current Year	n/a	255,912	n/a	n/a							
EXPIRED/UNUSED:											
Expired	0	0	0	0							
Unused AMT FTC	0	0	0	0							

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Pre-2018 AMT FTC: Numerator - Category 1: General Limitation Income

Year Ending for FTC Category 1.	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign AMTI	202,742,765	n/a	n/a
Less: Foreign AMT NOL CO Abs	0	n/a	n/a
Subtotal A	202,742,765	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	n/a	n/a
Subtotal A After S904(b)	202,742,765	n/a	n/a
Subtotal B	202,742,765	n/a	n/a
Allocate OFLs	0	n/a	n/a
Allocate ODLs	0	n/a	n/a
Subtotal C	202,742,765	n/a	n/a
Recapture OFLs	0	n/a	n/a
Subtotal D	202,742,765	n/a	n/a
Subtotal E	202,742,765	n/a	n/a
Recapture ODLs	4,269,717,147	n/a	n/a
Numerator Before Carryback	4,472,459,912	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	n/a	n/a
2nd Following Year	0	n/a	n/a
Numerator of Limit Fraction	4,472,459,912	n/a	n/a

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Pre-2018 AMT FTC: Numerator - Category 2: Passive Income

Year Ending for FTC Category 2:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Foreign AMTI	106,324,469	n/a	n/a
Less: Foreign AMT NOL CO Abs	0	n/a	n/a
Subtotal A	106,324,469	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	n/a	n/a
Subtotal A After S904(b)	106,324,469	n/a	n/a
Subtotal B	106,324,469	n/a	n/a
Allocate OFIs	0	n/a	n/a
Allocate ODLs	0	n/a	n/a
Subtotal C	106,324,469	n/a	n/a
Recapture OFIs	0	n/a	n/a
Subtotal D	106,324,469	n/a	n/a
Subtotal E	106,324,469	n/a	n/a
Recapture ODLs	25,731,265	n/a	n/a
Numerator Before Carryback	132,055,734	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From			
1st Following Year	0	n/a	n/a
2nd Following Year	0	n/a	n/a
Numerator of Limit Fraction	132,055,734	n/a	n/a

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Pre-2018 AMT/FTC Denominator

Year Ending	12-31-2017 4. AllAdj	12-31-2018 4. AllAdj	12-31-2019 4. AllAdj
AMTI/AMT NOL Generated	27,232,785,321	n/a	n/a
Add. AMT NOL Deduction	35,555,595	n/a	n/a
US AMTI Adjustment	0	n/a	n/a
Adjust for FTC Deducted	0	n/a	n/a
Less: Foreign Income/Loss	309,067,234	n/a	n/a
US Inc/Loss Before US NOL	26,959,273,682	n/a	n/a
Less US AMT NOL COs Absorbed	35,555,595	n/a	n/a
US Source AMTI	26,923,718,087	n/a	n/a
US Source Income/Loss After S904(b)	26,923,718,087	n/a	n/a
US Subtotal A	26,923,718,087	n/a	n/a
US Subtotal B	26,923,718,087	n/a	n/a
Recapture ODILs			
Cat 1: General Limitation Income	(4,269,717,147)	n/a	n/a
Cat 2: Passive Income	(25,731,265)	n/a	n/a
US Subtotal C	22,628,269,675	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	n/a	n/a
2nd Following Year	0	n/a	n/a
US AMTI	22,628,269,675	n/a	n/a
Sum of Numerators	4,504,515,646	n/a	n/a
Denominator of Fraction	27,232,785,321	n/a	n/a

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Pre-2018 AMT FTC: Schedule J, Part I - 12-31-2017

FTC Categories for Year Ending 12-2017.	Cat 1 4. AIAAdj	Cat 2 4. AIAAdj	Cat 3 4. ABAAdj	Cat 4 4. ABAAdj	Cat 5 4. AIAAdj
Foreign AMTI	202,742,765	106,324,469	0	0	0
Less: Foreign AMT NOL CO Abs	0	0	0	0	0
Subtotal A	202,742,765	106,324,469	0	0	0
S904(b) - Allocate Excess Foreign CGN ¹	0	0	0	0	0
Subtotal A After S904(b)	202,742,765	106,324,469	0	0	0
Subtotal B	202,742,765	106,324,469	0	0	0
Allocate OFLs	0	0	0	0	0
Allocate ODLs	0	0	0	0	0
Subtotal C	202,742,765	106,324,469	0	0	0
Recapture OFLs	0	0	0	0	0
Subtotal D	202,742,765	106,324,469	0	0	0
Subtotal E	202,742,765	106,324,469	0	0	0
Recapture ODLs	4,269,717,147	25,731,265	n/a	0	0
Numerator Before Carryback	4,472,459,912	132,055,734	0	0	0
Increase/Decrease Due To					
NOL Carryback From					
1st Following Year	0	0	0	0	0
2nd Following Year	0	0	0	0	0
Numerator of Limit Fraction	4,472,459,912	132,055,734	0	0	0

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Pre-2018 AMT FTC: Losses to be Recaptured - Cat 1: General Limitation Income

Year Ending for FTC Category 1:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Overall Foreign Loss (OFL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	n/a	n/a
Adjustment to Beginning Balance	0	n/a	n/a
Beginning Balance	0	n/a	n/a
Current Year Additions	0	n/a	n/a
Current Year Reductions	0	n/a	n/a
Subtotal	0	n/a	n/a
Less: Current Year Recapture	0	n/a	n/a
Ending Balance	0	n/a	n/a
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	4,269,717.147	n/a	n/a
Adjustment to Beginning Balance	0	n/a	n/a
Beginning Balance	4,269,717.147	n/a	n/a
Current Year Additions	0	n/a	n/a
Current Year Reductions	0	n/a	n/a
ODL Subtotal	4,269,717.147	n/a	n/a
Less: Current Year Recapture	4,269,717.147	n/a	n/a
ODL Ending Balance	0	n/a	n/a

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Pre-2018 AMT FTC: Losses to be Recaptured - Cat 2: Passive Income

Year Ending for FTC Category 2:	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
Overall Foreign Loss (OFL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	n/a	n/a
Adjustment to Beginning Balance	0	n/a	n/a
Beginning Balance	0	n/a	n/a
Current Year Additions	0	n/a	n/a
Current Year Reductions	0	n/a	n/a
Subtotal	0	n/a	n/a
Less: Current Year Recapture	0	n/a	n/a
Ending Balance	0	n/a	n/a
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	25,731,265	n/a	n/a
Adjustment to Beginning Balance	0	n/a	n/a
Beginning Balance	25,731,265	n/a	n/a
Current Year Additions	0	n/a	n/a
Current Year Reductions	0	n/a	n/a
ODL Subtotal	25,731,265	n/a	n/a
Less: Current Year Recapture	25,731,265	n/a	n/a
ODL Ending Balance	0	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912

EIN [REDACTED]

Pre-2018 AMT FTC, Schedule J, Parts II-IV - 12-31-2017

FTC Categories for Year Ending 12-2017	Cat 1 4 AllAdj	Cat 2 4 AllAdj	Cat 3 4 AllAdj	Cat 4 4 AllAdj	Cat 5 4 AllAdj
Overall Foreign Loss (OFL) Account:					
Beginning Balance:					
Balance Before Adjustment	0	0	n/a	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	0	0	n/a	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
Subtotal	0	0	n/a	0	0
Less: Current Year Recapture	0	0	0	0	0
Ending Balance	0	0	n/a	0	0
Overall Domestic Loss (ODL) Account:					
Beginning Balance:					
Balance Before Adjustment	4,269,717,147	25,731,265	n/a	0	0
Adjustment to Beginning Balance	0	0	0	0	0
Beginning Balance	4,269,717,147	25,731,265	n/a	0	0
Current Year Additions	0	0	0	0	0
Current Year Reductions	0	0	0	0	0
ODL Subtotal	4,269,717,147	25,731,265	n/a	0	0
Less: Current Year Recapture	4,269,717,147	25,731,265	n/a	0	0
ODI Ending Balance	0	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

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General Business Credit - Summary

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
STANDARD GBC GENERATED THIS YEAR:			
Current Standard GBC	317,271,060	262,704,818	445,062,929
Less: Allowed This Year	317,271,060	262,704,818	445,062,929
Available for CO/CB	0	0	0
ABSORBED BY CO/CB TO CURRENT YEARS:			
Carryovers and Carrybacks <From>/To			
From [12-2014]	54,440	0	0
From [12-2015]	25,757,999	0	34,368
From [12-2016]	222,249,404	0	166,806
From 12-2018	0	0	7,010
STANDARD GBC ALLOWED THIS YEAR:			
Standard GBC Limitation	4,021,377,830	4,520,495,318	5,959,920,715
Standard GBC Allowed This Year			
Refundable Standard GBC	n/a	n/a	n/a
Nonrefundable Standard GBC:			
From This Year	317,271,060	262,704,818	445,062,929
From Other Years	248,061,843	0	208,184
Total Nonrefundable	565,332,903	262,704,818	445,271,113
TOTAL GBC ALLOWED THIS YEAR:			
Nonrefundable Standard GBC Allowed	565,332,903	262,704,818	445,271,113
Zone Credits Allowed	0	0	0
Specified Credits Allowed	347,634	2,100,476	0
Eligible Small Business Credits Allowed	0	0	0
Total GBC Before Adjustment	565,680,537	264,805,294	445,271,113
Adjustment to Total GBC	0	0	0
Total Nonrefundable GBC Allowed	565,680,537	264,805,294	445,271,113

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

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General Business Credit Allowed

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
STANDARD GBC AVAILABLE:			
Current Standard GBC	317,271,060	262,704,818	445,062,929
Standard GBC Carryover	248,061,843	0	208,184
Standard GBC Carryback	0	0	0
Total Standard GBC Available	565,332,903	262,704,818	445,271,113
STANDARD GBC LIMITATION:			
Net Income Tax:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Pre-2018 Alternative Minimum Tax	0	n/a	n/a
Post-2022 Alternative Minimum Tax	n/a	n/a	n/a
Less: Subpart B Credits	195,952,418	291,870,895	370,869,670
Net Income Tax	9,377,354,067	6,027,327,091	7,946,560,954
Net Regular Tax:			
Federal Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
Less: Subpart B Credits	195,952,418	291,870,895	370,869,670
Net Regular Tax	9,377,354,067	6,027,327,091	7,946,560,954
Standard GBC Limitation:			
Net Income Tax	9,377,354,067	6,027,327,091	7,946,560,954
Less: Greater of -			
Pre-2018 Tentative Minimum Tax	5,355,976,237	0	0
25% x (Net Regular Tax - \$25,000)	2,344,332,267	1,506,831,773	1,986,640,239
25% x (Net Income Tax - \$25,000)	n/a	n/a	n/a
Normal GBC Limit	4,021,377,830	4,520,495,318	5,959,920,715
Add: Former Section 38(c)(2)	0	0	0
GBC Limit Before S168(k)(4)	4,021,377,830	4,520,495,318	5,959,920,715
Add: S168(k)(4) Additional GBC Limitation:			
Electon I (2008-09)	n/a	n/a	n/a
Electon II (2009-10)	n/a	n/a	n/a
Standard GBC Limitation	4,021,377,830	4,520,495,318	5,959,920,715
TOTAL STANDARD GBC ALLOWED:			
Standard GBC Allowed	565,332,903	262,704,818	445,271,113
Less: Nonrefundable Standard GBC Allowed	565,332,903	262,704,818	445,271,113
Refundable Standard GBC Allowed	n/a	n/a	n/a
TOTAL GENERAL BUSINESS CREDIT ALLOWED:			
Nonrefundable Standard GBC Allowed	565,332,903	262,704,818	445,271,113
Zone Credits Allowed	0	0	0
Specified Credits Allowed	347,634	2,100,476	0
Eligible Small Business Credits Allowed	0	0	0
Total GBC Before Adjustment	565,680,537	264,805,294	445,271,113
Adjustment to Total GBC	0	0	0
Total General Business Credit Allowed	565,680,537	264,805,294	445,271,113

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
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EIN [REDACTED]

Standard General Business Credit Carryovers/Carrybacks

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Sum of Carryovers from:			
(12-31-2014)	54,440	0	0
(12-31-2015)	25,757,999	0	34,368
(12-31-2016)	222,249,404	0	166,806
12-31-2018	n/a	n/a	7,010
Standard GBC Carryovers	248,061,843	0	208,184
Standard GBC Carrybacks	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
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Standard General Business Credit Absorbed											
Year Ending:	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
Sum of Current Credits Absorbed in Current Year	0	0	0	0	0	0	0	0	0	54,440	25,757,999
Absorbed by Carryover to:											
12-31-2017	0	0	0	0	0	0	0	0	0	54,440	25,757,999
12-31-2019	0	0	0	0	0	0	0	0	0	0	34,368
Sum of Unused Credits	0	0	0	0	0	0	0	0	0	0	0

Year Ending:	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Sum of Current Credits Absorbed in Current Year	221,727,821	317,271,060	262,704,818	445,062,929
Absorbed by Carryover to:				
12-31-2017	222,249,404	n/a	n/a	n/a
12-31-2019	166,806	0	7,010	n/a
Sum of Unused Credits	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

Research Credit Allowed

Year Ending	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
CREDIT AVAILABLE:			
Current Credit	317,216,902	262,704,818	444,933,561
Credit Carryovers	247,974,965	0	208,184
Credit Carrybacks	0	0	0
Total Credit Available	565,191,867	262,704,818	445,141,745
ALLOWED AFTER 1985:			
Credit Allowed in Standard GBC	565,191,867	262,704,818	445,141,745

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
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Research Credit Carryovers/Carrybacks

Year Ending.	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
Credit Carryovers from:			
(12-31-2014)	54,440	0	0
(12-31-2015)	25,727,999	0	34,368
(12-31-2016)	222,192,526	0	166,806
12-31-2018	n/a	n/a	7,010
Total Credit Carryovers	247,974,965	0	208,184
Total Credit Carrybacks	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-201912
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Research Credit Absorbed

Year Ending	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT CREDIT:											
Current Credit	0	0	0	0	0	0	0	0	0	54,440	25,727,999
Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	0
CREDIT CARRYOVERS:											
Balance After Carrybacks	0	0	0	0	0	0	0	0	0	54,440	25,727,999
User Entries - Increase/Decrease:											
12-31-2017	0	0	0	0	0	0	0	0	0	0	0
12-31-2019	0	0	0	0	0	0	0	0	0	0	34,368
Balance After User Entries	0	0	0	0	0	0	0	0	0	54,440	25,762,367
Absorbed by Carryover to:											
12-31-2017	0	0	0	0	0	0	0	0	0	54,440	25,727,999
12-31-2019	0	0	0	0	0	0	0	0	0	0	34,368
EXPIRED/UNUSED CREDIT:											
Unused Credit	0	0	0	0	0	0	0	0	0	0	0

Year Ending	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
CURRENT CREDIT:				
Current Credit	221,670,943	317,216,902	262,704,818	444,933,561
Absorbed in Current Year	0	317,216,902	262,704,818	444,933,561
CREDIT CARRYOVERS:				
Balance After Carrybacks	221,670,943	0	0	0
User Entries - Increase/Decrease:				
12-31-2017	521,583	n/a	n/a	n/a
12-31-2019	166,806	0	7,010	n/a
Balance After User Entries	222,359,332	0	7,010	0
Absorbed by Carryover to:				
12-31-2017	222,192,526	n/a	n/a	n/a
12-31-2019	166,806	0	7,010	n/a
EXPIRED/UNUSED CREDIT:				
Unused Credit	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-2019
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Alternative Fuel Vehicle Refueling Credit Allowed

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Credit Available:			
Current Credit	54,158	0	129,368
Carryovers	86,878	0	0
Carrybacks	0	0	0
Total Credit Available	141,036	0	129,368
Credit Allowed:			
Credit Allowed in Standard GBC	141,036	0	129,368

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912

EN [REDACTED]

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Alternative Fuel Vehicle Refueling Credit Carryovers/Carrybacks

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Credit Carryovers from:			
(12-31-2015)	30,000	0	0
(12-31-2016)	56,878	0	0
Total Credit Carryovers	86,878	0	0
Total Credit Carrybacks	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017/12-2019/12
EIN [REDACTED]

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Alternative Fuel Vehicle Refueling Credit Absorbed											
Year Ending:	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT CREDIT:											
Current Credit	0	0	0	0	0	0	0	0	0	0	30,000
Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	0
CREDIT CARRYOVERS:											
Balance After Carrybacks	0	0	0	0	0	0	0	0	0	0	30,000
Balance After User Entries	0	0	0	0	0	0	0	0	0	0	30,000
Absorbed by Carryover to: 12-31-2017	0	0	0	0	0	0	0	0	0	0	30,000
EXPIRED/UNUSED CREDIT:											
Unused Credit	0	0	0	0	0	0	0	0	0	0	0
Year Ending:	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj							
CURRENT CREDIT:											
Current Credit	56,878	54,158	0	129,368							
Absorbed in Current Year	0	54,158	0	129,368							
CREDIT CARRYOVERS:											
Balance After Carrybacks	56,878	n/a	n/a	n/a							
Balance After User Entries	56,878	0	0	0							
Absorbed by Carryover to: 12-31-2017	56,878	n/a	n/a	n/a							
EXPIRED/UNUSED CREDIT:											
Unused Credit	0	0	0	0							

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
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Specified: Total Credits Allowed

Year Ending	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
SPECIFIED CREDITS AVAILABLE:			
Current Specified Credits	347,634	2,100,476	0
Specified Credits Carryovers	0	0	0
Specified Credits Carrybacks	0	0	0
Total Specified Credits Available	347,634	2,100,476	0
SPECIFIED CREDITS LIMIT:			
Net Income Tax	9,377,354,067	6,027,327,091	7,946,560,954
Less: 25% x (Net Regular Tax - \$25,000)	2,344,332,267	1,506,831,773	1,986,640,239
Specified Credits Limit Before Other GBC	7,033,021,800	4,520,495,318	5,959,920,715
Standard GBC Allowed (Nonrefundable)	565,332,903	262,704,818	445,271,113
Specified Credits Limitation	6,467,688,897	4,257,790,500	5,514,649,602
ALLOWED YEARS ENDING AFTER 10/22/2004:			
Specified Credits Allowed	347,634	2,100,476	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-2019
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Specified Rehabilitation Credit (Post-2007) Allowed

Year Ending:	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
Specified Credit Available:			
Current Credit	347,634	0	0
Carryovers	0	0	0
Carrybacks	0	0	0
Total Credit Available	347,634	0	0
Credit Allowed:			
Specified Credit Allowed	347,634	0	0

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Specified Rehabilitation Credit (Post-2007) Absorbed											
Year Ending:	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT CREDIT:											
Current Specified Credit	0	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	0
CREDIT CARRYOVERS:											
EXPIRED/UNUSED CREDIT:											
Unused Specified Credit	0	0	0	0	0	0	0	0	0	0	0

Year Ending	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
CURRENT CREDIT:				
Current Specified Credit	0	347,634	0	0
Absorbed in Current Year	0	347,634	0	0
CREDIT CARRYOVERS:				
EXPIRED/UNUSED CREDIT:				
Unused Specified Credit	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

Specified Energy Credit (Post-10/3/2008) Allowed

Year Ending:	12-31-2017 4 AllAdj	12-31-2018 4 AllAdj	12-31-2019 4 AllAdj
Specified Credit Available:			
Current Credit	0	2,100,476	0
Carryovers	0	0	0
Carrybacks	0	0	0
Total Credit Available	0	2,100,476	0
Credit Allowed:			
Specified Credit Allowed	0	2,100,476	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912
EIN [REDACTED]

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Specified Energy Credit (Post-10/3/2008) Absorbed											
Year Ending:	[12-31-2005] 4: AllAdj	[12-31-2006] 4: AllAdj	[12-31-2007] 4: AllAdj	[12-31-2008] 4: AllAdj	[12-31-2009] 4: AllAdj	[12-31-2010] 4: AllAdj	[12-31-2011] 4: AllAdj	[12-31-2012] 4: AllAdj	[12-31-2013] 4: AllAdj	[12-31-2014] 4: AllAdj	[12-31-2015] 4: AllAdj
CURRENT CREDIT:											
Current Specified Credit	0	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	0
CREDIT CARRYOVERS:											
EXPIRED/UNUSED CREDIT:											
Unused Specified Credit	0	0	0	0	0	0	0	0	0	0	0

Year Ending	[12-31-2016] 4: AllAdj	12-31-2017 4: AllAdj	12-31-2018 4: AllAdj	12-31-2019 4: AllAdj
CURRENT CREDIT:				
Current Specified Credit	0	0	2,190,476	0
Absorbed in Current Year	0	0	2,190,476	0
CREDIT CARRYOVERS:				
EXPIRED/UNUSED CREDIT:				
Unused Specified Credit	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712-201912

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EIN [REDACTED]

Minimum Tax Credit Allowed

Year Ending	12-31-2017 4. AIAAdj	12-31-2018 4. AIAAdj	12-31-2019 4. AIAAdj
ELECT FULL REFUND FOR 2018:			
Elect Full Refund for 2018 (Y/N) (S53(e)(5))	n/a	No	n/a
MTC GENERATED THIS YEAR:			
Net Minimum Tax	0	n/a	n/a
Plus Credits Disallowed:			
Orphan Drug (Pre-1995)	0	n/a	n/a
Nonconventional Fuel (Pre-2006)	0	n/a	n/a
Qualified Electric Vehicle (Pre-2007)	0	n/a	n/a
MTC Generated This Year	0	n/a	n/a
MTC LIMITATION FOR THIS YEAR:			
Regular Income Tax	9,573,306,485	6,319,197,986	8,317,430,624
BEAT	0	0	0
Regular Income Tax Plus BEAT	0	0	0
Less Non-Bond Credits	761,632,955	556,676,189	816,140,783
Regular Tax After Credits	8,811,673,530	5,762,521,797	7,501,289,841
Regular Tax Plus BEAT After Credits	0	0	0
Less Pre-2018 Tentative Minimum Tax	5,355,976,237	n/a	n/a
Less Post-2022 Tentative Minimum Tax	0	0	0
MTC Limitation Before S55(e) Restrictions	3,455,697,293	5,762,521,797	7,501,289,841
Net Change Due to S55(e) Restrictions	0	n/a	n/a
MTC Limitation After S55(e) Restrictions	3,455,697,293	5,762,521,797	7,501,289,841
Increase/Decrease MTC Limit	0	0	0
Preliminary MTC Limitation (Pre-2018)	3,455,697,293	5,762,521,797	n/a
Preliminary MTC Limitation (Post-2023)	0	0	0
MTC Limitation After S168(k)(4):			
Preliminary MTC Limitation (Pre-2018)	3,455,697,293	n/a	n/a
MTC Limitation After S168(k)(4)	3,455,697,293	n/a	n/a
MTC Limitation After S53(e) (2018-2019):			
Less Preliminary MTC Limitation	n/a	5,762,521,797	7,501,289,841
S53(e) Refundable Percentage (%)	n/a	50	100
S53(e) Short Year Factor	n/a	1	1
Preliminary MTC Limitation (Post-2017)	n/a	5,762,521,797	7,501,289,841
MTC Limitation After S53(e)	n/a	5,762,521,797	7,501,289,841
MTC ALLOWED THIS YEAR:			
MTC from Previous Year	54,883,684	0	n/a
MTC Limitation	3,455,697,293	5,762,521,797	7,501,289,841
Total MTC Allowed	54,883,684	0	n/a
Less Nonrefundable MTC Allowed	54,883,684	0	n/a
Refundable MTC Allowed This Year	n/a	0	0
MTC AVAILABLE FOR NEXT YEAR:			
MTC to Next Year Before Adjustment	0	n/a	n/a
Increase/Decrease MTC to Next Year	0	0	n/a
MTC Available for Next Year	0	n/a	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-12 (SECTION 965)
EIN [REDACTED]

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Main Worksheet - Input

IRS Form/Lines: Tax Year Begins in 2017		3: w965	6: AllAdj(w965)	Diff 6-3
***** 12-31-2017 *****				
CONTROLLED GROUP:				
Member of Controlled Group	@ 1120, Sch J: 1	Yes	Yes	No
REGULAR TAXABLE INCOME:				
Total Income	@ 1120: 11	27,730,028,991	48,375,675,869	20,645,646,878
Total Deductions Except S199	@ 1120: 27-25	13,576,960,781	12,031,089,355	(1,545,871,426)
TI Before NOL/Special Deductions	@ 1120: 28-25	14,153,068,210	36,344,586,514	22,191,518,304
Less NOL Deduction	@ 1120: 29a (See Help)	37,622,233	35,555,565	(2,066,668)
Special Deductions	@ 1120: 29b	0	0	0
Taxable Income Before S199	@ 1120: 28+25-29c	14,115,445,977	36,309,030,949	22,193,584,972
Less Section 199 Deduction (2005-2017)	@ 1120: 25	0	0	0
Add Other Taxable Income	@ 1120: 30 (portion)	0	0	0
Regular Taxable Income	@ 1120: 30	14,115,445,977	36,309,030,949	22,193,584,972
REGULAR INCOME TAX & MINIMUM TAX:				
Federal Income Tax Before Adjust	@ 1120 Sch J: 2 (portion)	4,940,406,092	12,708,160,832	7,767,754,740
Adjustment to Federal Income Tax	@ 1120 Sch J: 2 (portion)	0	0	0
Federal Income Tax	@ 1120 Sch J: 2	4,940,406,092	12,708,160,832	7,767,754,740
Pre-2018 Alternative Minimum Tax	@ 1120 Sch J: 3	0	0	0
Post-2022 Alternative Minimum Tax		n/a	n/a	0
Base Erosion Minimum Tax Amount		n/a	n/a	0
Federal Income Tax Plus Minimum Tax	@ 1120 Sch J: 4	4,940,406,092	12,708,160,832	7,767,754,740
CREDITS:				
Foreign Tax Credit	@ 1120, Sch J: 5a	440,058,880	478,051,150	37,992,270
Other Subpart B Credits	@ 1120, Sch J: 5b	0	0	0
General Business Credit	@ 1120, Sch J: 5c	591,951,898	565,680,537	(26,271,361)
Minimum Tax Credit/Bond Credits	@ 1120, Sch J: 5d-5e	54,883,684	54,883,684	0
OTHER TAXES:				
Other Taxes & Interest	@ 1120, Sch J: 10	0	0	0
TCJA S965 Transition Tax: Net Tax Liab (2017)	@ 1120, Sch J: 11 (portion)	0	0	0
FEDERAL BALANCE DUE:				
Federal Total Tax	@ 1120: 31	3,853,511,630	11,609,545,461	7,756,033,831
Net S965 Tax Liability Paid (2018-2025)		n/a	n/a	0
Less: Payments, Credits, & Net S965 Tax Liab	@ 1120: 32	3,853,511,630	3,853,511,630	0
Plus: Estimated Tax Penalty	@ 1120: 33	0	0	0
Federal Balance Due		0	7,756,033,831	7,756,033,831

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-12 (SECTION 965)
EIN [REDACTED]

Dividends and Inclusions - Input

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
TCJA 2017 S965 TRANSITION TAX:			
S965 Inclusion Amount	n/a	n/a	0
S965 Deduction Amount	n/a	n/a	0
DIVIDENDS WITHOUT DRD:			
Subpart F Inc from CFCs @ 1120, Sch C: 14(a)	8,882,952,673	8,833,317,426	(49,635,247)
GILTI Inclusion	0	0	0
Foreign Dividend Gross-up (S78):			
GILTI S78 Gross-up	0	0	0
Gross-up from Other Categories	286,748,438	291,427,450	4,679,012
Total Gross-Up @ 1120, Sch C: 15(a)	286,748,438	291,427,450	4,679,012
TOTAL DIVIDENDS AND INCLUSIONS:			
Dividends From < 20%-Owned	0	0	0
Dividends From 20%-Owned	0	0	0
TCJA 2017 S965 Inclusion Amount	n/a	n/a	0
Dividends Without DRD	9,169,701,111	9,124,744,876	(44,956,235)
Dividends and Inclusions @ 1120, Sch C: 19(a)	9,169,701,111	9,124,744,876	(44,956,235)
SPECIAL DEDUCTIONS:			
Dividends-Received Deduction @ 1120, Sch C: 20-18(c)	0	0	0
TCJA 2017 S965 Deduction Amount	n/a	n/a	0
Dividends Paid Deduction @ 1120, Sch C: 18(c)	0	0	0
Total Special Deductions @ 1120, 29b	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

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Subpart F Inc from CFCs - Custom Input

Year Ending:	===== 12-31-2017 =====		
	3: w965	6: AllAdj(w965)	Diff. 6-3
From e-File	0	0	0
Subpart F Inc from CFCs	158,689,453	158,689,453	0
965(a) inclusion	21,086,452,821	21,086,452,821	0
965(c) deduction	(12,362,189,601)	(12,362,189,601)	0
Sec 965(a) Inclusion	0	(407,648,525)	(407,648,525)
Sec 965(c) Deduction	0	358,013,278	358,013,278
Subpart F Inclusion	0	0	0
Total	8,882,952,673	8,833,317,426	(49,635,247)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-12 (SECTION 965)

Pre-2018 AMT Main Worksheet - Input

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====		
	3: w965	6: AllAd:(w965)	Diff: 6-3
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	No	No
PRE-2018 ALT MIN TAXABLE INCOME:			
Taxable Income Before S199	@ 1120 28-25-29a-29b 14,115,445,977	36,309,030,949	22,193,584,972
Add: Regular NOL Deduction	@ 1120: 29a (See Help) 37,622,233	35,555,565	(2,066,668)
TI Before Regular NOLD	@ 4626: 1-1120 25 14,153,068,210	36,344,586,514	22,191,518,304
Add: Adjustments/Preference Items Before S199	@ 4626: 2-2j (See Help) (119,518,893)	(119,518,893)	0
Preadjustment AMTI	@ 4626: 3 (See Help) 14,033,549,317	36,225,067,621	22,191,518,304
Pre-2018 ACE Adjustment	@ 4626: 4e 0	0	0
Pre-2018 AMTI Before Energy/NOL	@ 4626: 5 (See Help) 14,033,549,317	36,225,067,621	22,191,518,304
Less: Energy Deduction (1991-1992)	n/a	n/a	0
AMT NOL Deduction	@ 4626: 6 37,622,263	35,555,595	(2,066,668)
AMTI Before Section 199 Deduction	13,995,927,054	36,189,512,026	22,193,584,972
Less: S199 Deduction for AMTI (2005-2017)	0	0	0
Pre-2018 AMTI Before Other	13,995,927,054	36,189,512,026	22,193,584,972
Add: Other AMTI	0	0	0
Pre-2018 Alternative Minimum Taxable Income	@ 4626: 7 13,995,927,054	36,189,512,026	22,193,584,972
PRE-2018 ALTERNATIVE MINIMUM TAX:			
Pre-Cred 4 TMT	@ 4626 10 2,799,185,411	7,237,902,405	4,438,716,994
Pre-2018 AMT Foreign Tax Credit	@ 4626 11 440,058,880	372,679,559	(67,379,321)
Pre-2018 Tentative Minimum Tax	@ 4626 12 2,359,126,531	6,865,222,846	4,506,096,315
Regular Tax After FTC	@ 4626 13 4,500,347,212	12,230,109,682	7,729,762,470
Pre-2018 AMT Before Adjustment	@ 4626 14 (portion) 0	0	0
Adjustment to AMT	@ 4626 14 (portion) 0	0	0
Pre-2018 Alternative Minimum Tax	@ 4626: 14 0	0	0
MTC TO NEXT YEAR:			
MTC to Next Year Before Adjust	0	0	0
Adjustment to MTC	0	0	0
MTC Carried to Next Year	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-12 (SECTION 965)

EIN [REDACTED]
FTC Main Worksheet - Input

IRS Form/Lines: Tax Year Begins in 2017		3: w/965	6: AllAdj(w/965)	Diff 6-3
ELECTIONS:				
Deduct Foreign Tax (Y/N)		No	No	No
Simplified AMT FTC (Y/N)		No	No	No
Apply ODL/OFL Regs Early (2007) (Y/N)		n/a	n/a	No
Pre-2018 ODL Recapture Percentage (2018-2027):				
Eject S904(g)(5) for Pre-2018 ODLs (Y/N)		n/a	n/a	No
Pre-2018 ODL Recapture Pct (50-100)		n/a	n/a	0
REGULAR FTC:				
Summary				
Total Regular FTC from Categories	@ 1120, Sch J 5a (portion)	440,058,880	478,051,150	37,992,270
Adjustment to Regular FTC	@ 1120, Sch J 5a (portion)	0	0	0
Less: Boycott Reduction	@ 1118, Sch B, Part III, 5	0	0	0
Total Regular FTC Allowed	@ 1120, Sch J: 5a	440,058,880	478,051,150	37,992,270
Limitation Fraction:				
Increase/Decrease US Taxable Income		0	0	0
Increase/Decrease Income Tax for FTC		0	0	0
Rounding of Limit Fraction (0=No):				
1-14 Decimal Places		9	9	0
Increase Denominator Post-2017 S904(b)(4)		n/a	n/a	0
Foreign Taxes Deducted:				
Adjustment to Proforma Taxable Inc		0	0	0
Adjustment to Proforma Income Tax		0	0	0
S904(b) Capital Gain Net Income (CGNI):				
Foreign CGNI		0	0	0
Less: Worldwide CGNI		0	0	0
Excess Foreign CGNI		0	0	0
Pre-2018 AMT FTC:				
Summary				
Total Pre-2018 AMT FTC from Categories	@ 4626 11 (portion)	440,058,880	372,679,559	(67,379,321)
Adjustment to AMT FTC	@ 4626 11 (portion)	0	0	0
Less: Boycott Reduction	@ 1118 (AMT), Sch B, Part III, 5	0	0	0
Total Pre-2018 AMT FTC Allowed	@ 4626 11	440,058,880	372,679,559	(67,379,321)
Limitation Fraction:				
Adjustment to US AMTI		0	0	0
Adjustment to TMT for AMT FTC		0	0	0
Rounding of Limit Fraction (0=No):				
1-14 Decimal Places		9	9	0
Adjust Pre-2005 Overall AMT FTC Limit		0	0	0
Foreign Taxes Deducted				
Adjustment to Proforma AMTI		0	0	0
Adjustment to Proforma Overall Limit		0	0	0
S904(b) Capital Gain Net Income (CGNI):				
Worldwide:				
Worldwide CGNI		0	0	0
Increase/Decrease for AMTI		0	0	0
Worldwide CGNI for AMTI		0	0	0
Excess Foreign				
Foreign CGNI for AMTI		0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2011-12 (SECTION 965)
EIN [REDACTED]

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FTC Current Input - Category 1: General Limitation Income

IRS Form/Lines: Tax Year Begins in 2017		3. w965	6: AllAdj(w965)	Diff: 6-3
REGULAR FTC:				
Current Foreign Income/Loss:				
Income/Loss Before Gross-Up	@ 1118, Sch A, Cols 13-2(b)-3(b)-11	8,917,933.179	8,868,297.932	(49,635.247)
Dividend Gross-Up (S78)	@ 1118, Sch A, Cols 2(b)-3(b)	286,492.526	291,171.538	4,679.012
Total Income/Loss	@ 1118, Sch A, Cols 13-11	9,204,425.705	9,159,469.470	(44,956.235)
Capital Gains/Losses in Total		0	0	0
Current Foreign Taxes:				
Taxes Paid/Accrued	@ 1118, Sch B, Part II: 1a-1b-3-4	153,310.442	81,252.109	(72,058.333)
Taxes Deemed Paid	@ 1118, Sch B, Part II: 2	286,492.526	291,171.538	4,679.012
Total Current Taxes	@ 1118, Sch B, Part II: 1a-1b-2-3-4	439,802.968	372,423.647	(67,379.321)
Overall Foreign Loss (OFL) Account:				
OFL Account Reduction	@ 1118, Sch J, Part III: 3	0	0	0
OFL Additional Recapture		0	0	0
Overall Domestic Loss (ODL) Account:				
ODL Account Reduction	@ 1118, Sch J, Part IV: 3	0	0	0
Pre-2018 Portion of ODL Account Reduction		0	0	0
FTC Category				
Increase Numerator (Post-2017)		n/a	n/a	0
Increase/Decrease Limitation		0	0	0
Increase/Decrease FTC Allowed		0	0	0
Pre-2018 AMT FTC:				
Current Foreign AMTI:				
AMTI Before Gross-Up	@ 1118 (AMT), Sch A, Cols 13-2(b)-3(b)-11	8,917,933.179	8,868,297.932	(49,635.247)
Dividend Gross-Up (S78)	@ 1118 (AMT), Sch A, Cols 2(b)-3(b)	286,492.526	291,171.538	4,679.012
Total Foreign AMTI	@ 1118 (AMT), Sch A, Cols 13-11	9,204,425.705	9,159,469.470	(44,956.235)
Current Foreign Taxes:				
Taxes Paid/Accrued	@ 1118 (AMT), Sch B, Part II: 1a-1b-3-4	153,310.442	81,252.109	(72,058.333)
Taxes Deemed Paid	@ 1118 (AMT), Sch B, Part II: 2	286,492.526	291,171.538	4,679.012
Total Current Taxes	@ 1118 (AMT), Sch B, Part II: 1a-1b-2-3-4	439,802.968	372,423.647	(67,379.321)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

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Category 1: Income/Loss Before Gross-Up - Custom Input

Year Ending:	----- 12-31-2017 -----		
	3: w/965	6: AllAd(w/965)	Dif: 6-3
From e-File	0	0	0
Income/Loss Before Gross-Up	193,669,959	193,669,959	0
FSI For Subpart F & Sec 78	0	0	0
FTC General Basket Income	0	0	0
Sec 78 GU Adj	0	0	0
965(a) inclusion	21,086,452,821	21,086,452,821	0
965(c) deduction	(12,362,189,601)	(12,362,189,601)	0
Sec 965(a) inclusion	0	(407,648,525)	(407,648,525)
Sec 965(c) Deduction	0	358,013,278	358,013,278
Total	8,917,933,179	8,868,297,932	(49,635,247)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-12 (SECTION 965)
EIN [REDACTED]

Category 1 AMTI Before Gross-Up - Custom Input

Year Ending:	12-31-2017		
	3: w965	6: AllAdj(w965)	Diff: 6-3
AMTI Before Gross-Up	193,669,959	193,669,959	0
965(a) inclusion	21,086,452.821	21,086,452.821	0
965(c) deduction	(12,362,189.601)	(12,362,189.601)	0
Sec 965(a) inclusion	0	(407,648,525)	(407,648,525)
Sec 965(c) Deduction	0	358,013,278	358,013,278
Total	8,917,933.179	8,868,297.932	(49,635,247)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017/12 (SECTION 965)

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EIN [REDACTED]

Category 1 Taxes Paid/Accrued - Custom Input

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: ABAAdj(w/965)	Diff: 6-3
From e-File	0	0	0
Taxes Paid/Accrued	153,487,818	153,487,818	0
Plug to tie to filed tax return	(177,376)	0	177,376
Brazil WHT	0	(76,869,698)	(76,869,698)
FTC General Basket Creditable Taxes	0	0	0
Section 901 Creditable Taxes	0	4,633,989	4,633,989
Total	153,310,442	81,252,109	(72,058,333)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712/SECTION 965)
E# [REDACTED]

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Category 1 Taxes Paid/Accrued - Custom Input

Year Ending:	***** 12-31-2017 *****		
	3 w/965	6 Adj(w/965)	D# 6-3
Taxes Paid/Accrued	153,487,818	153,487,818	0
Plug to be to filed tax return	(177,376)	0	177,376
Brazil WHT (AMT)	0	(76,869,698)	(76,869,698)
Section 901 Creditable Taxes (AMT)	0	4,633,989	4,633,989
Total	153,310,442	81,252,109	(72,058,333)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)

EIN [REDACTED]

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Category 1 Sec 965: Other Tax Deemed Paid - Custom Input

Year Ending	***** 12-31-2017 *****		
	3 w/965	6 ABAid(w/965)	Diff: 6-3
Sec 965 Deemed Paid Taxes	277,419,720	277,419,720	0
Sec 965 Deemed Paid Foreign Taxes	0	4,679,012	4,679,012
Total	277,419,720	282,098,732	4,679,012

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017,12 (SECTION 965)
EIN [REDACTED]

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Tax Deemed Paid Category 1 - Imported From e-File (Tier 1)

IRS Form/Lines: Tax Year Begins in 2017		3: w/965	6: Adj(w/965)	Dif: 6-3
REGULAR FTC:				
Post-1986 Undistributed Earnings (FC) @ 1118, Sch C, Part I: 4		0	0	0
Post-1986 Foreign Taxes:				
Opening Balance @ 1118, Sch C, Part I: 5		0	0	0
Taxes Paid/Accrued @ 1118, Sch C, Part I: 6(a)		0	0	0
Deemed from Lower Tier @ 1118, Sch C, Part I: 6(b)		0	0	0
Ending Balance @ 1118, Sch C, Part I: 7		0	0	0
Post-1986 Fraction:				
Round Fraction (0=No)				
1-14 Decimal Places		0	0	0
Dividends from Post-1986 (FC) @ 1118, Sch C, Part I: 8(a)		0	0	0
Post-1986 Fraction @ 1118, Sch C, Part I: 9		0	0	0
Foreign Tax Deemed Paid:				
Post-1986 Tax Deemed Paid @ 1118, Sch C, Part I: 12		0	0	0
Other Tax Deemed Paid @ 1118, Sch C, Part II: 8(b)-III: 8		9,072,806	9,072,806	0
Total Tax Deemed Paid		9,072,806	9,072,806	0
Pre-2018 AMT FTC:				
Post-1986 Undistributed Earnings (FC) @ 1118 (AMT) Sch C, Part I: 4		0	0	0
Post-1986 Foreign Taxes:				
Opening Balance @ 1118 (AMT) Sch C, Part I: 5		0	0	0
Taxes Paid/Accrued @ 1118 (AMT), Sch C, Part I: 6(a)		0	0	0
Deemed from Lower Tier @ 1118 (AMT), Sch C, Part I: 6(b)		0	0	0
Ending Balance @ 1118 (AMT), Sch C, Part I: 7		0	0	0
Post-1986 Fraction:				
Round Fraction (0=No)				
1-14 Decimal Places		0	0	0
Dividends from Post-1986 (FC) @ 1118 (AMT), Sch C, Part I: 8(a)		0	0	0
Post-1986 Fraction @ 1118 (AMT), Sch C, Part I: 9		0	0	0
Foreign Tax Deemed Paid:				
Post-1986 Tax Deemed Paid @ 1118 (AMT), Sch C, Part I: 10		0	0	0
Other Tax Deemed Paid @ 1118 (AMT), Sch C, Part II: 8(b)-III: 8		9,072,806	9,072,806	0
Total Tax Deemed Paid		9,072,806	9,072,806	0

META PLATFORMS INC. FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Tax Deemed Paid Category 1 - Sec.965 (Tier 1)

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
REGULAR FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118, Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118, Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118, Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118, Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118, Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118, Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118, Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118, Sch C, Part I: 12	0	0	0
Other Tax Deemed Paid @ 1118, Sch C, Part II: 8(b)+III: 8	277,419,720	282,098,732	4,679,012
Total Tax Deemed Paid	277,419,720	282,098,732	4,679,012
Pre-2018 AMT FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118 (AMT), Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118 (AMT) Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118 (AMT) Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118 (AMT) Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118 (AMT), Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118 (AMT), Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118 (AMT), Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118 (AMT), Sch C, Part I: 10	0	0	0
Other Tax Deemed Paid @ 1118 (AMT) Sch C, Part II: 8(b)+III: 8	277,419,720	282,098,732	4,679,012
Total Tax Deemed Paid	277,419,720	282,098,732	4,679,012

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017/12 (SECTION 965)
EIN [REDACTED]

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FTC Current Input - Category 2 Passive Income

IRS Form/Lines: Tax Year Begins in 2017		3 w/965	6 AMAdj(w/965)	Diff: 6-3
REGULAR FTC:				
Current Foreign Income/Loss				
Income/Loss Before Gross-Up	@ 1118, Sch A, Cols 13-2(b)-3(b)+11	106,068,557	106,068,557	0
Dividend Gross-Up (S78)	@ 1118, Sch A, Cols 2(b)+3(b)	255,912	255,912	0
Total Income/Loss	@ 1118, Sch A, Cols 13+11	106,324,469	106,324,469	0
Capital Gains/Losses in Total		0	0	0
Current Foreign Taxes:				
Taxes Paid/Accrued	@ 1118, Sch B, Part II, 1a+1b-3+4	0	0	0
Taxes Deemed Paid	@ 1118, Sch B, Part II, 2	255,912	255,912	0
Total Current Taxes	@ 1118, Sch B, Part II, 1a+1b+2-3+4	255,912	255,912	0
Overall Foreign Loss (OFL) Account:				
OFL Account Reduction	@ 1118, Sch J, Part III, 3	0	0	0
OFL Additional Recapture		0	0	0
Overall Domestic Loss (ODL) Account:				
ODL Account Reduction	@ 1118, Sch J, Part IV, 3	0	0	0
Pre-2018 Portion of ODL Account Reduction		0	0	0
FTC Category:				
Increase Numerator (Post-2017)		n/a	n/a	0
Increase/Decrease Limitation		0	0	0
Increase/Decrease FTC Allowed		0	0	0
Pre-2018 AMT FTC:				
Current Foreign AMTI:				
AMTI Before Gross-Up	@ 1118 (AMT), Sch A, Cols 13-2(b)-3(b)+11	106,068,557	106,068,557	0
Dividend Gross-Up (S78)	@ 1118 (AMT), Sch A, Cols 2(b)+3(b)	255,912	255,912	0
Total Foreign AMTI	@ 1118 (AMT), Sch A, Cols 13+11	106,324,469	106,324,469	0
Current Foreign Taxes:				
Taxes Deemed Paid	@ 1118 (AMT), Sch B, Part II, 2	255,912	255,912	0
Total Current Taxes	@ 1118 (AMT), Sch B, Part II, 1a+1b+2-3+4	255,912	255,912	0

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Tax Deemed Paid Category 2 - Imported From e-File (Tier 1)

IRS Form/Lines: Tax Year Begins in 2017	12-31-2017		
	3: w/965	6: AllAdj(w/965)	Diff 6-3
REGULAR FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118, Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118, Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118, Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118, Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118, Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118, Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118, Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118, Sch C, Part I: 12	0	0	0
Other Tax Deemed Paid @ 1118, Sch C, Part II: 8(b)+III:8	255,912	255,912	0
Total Tax Deemed Paid	255,912	255,912	0
Pre-2018 AMT FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118 (AMT), Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118 (AMT), Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118 (AMT), Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118 (AMT), Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118 (AMT), Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118 (AMT), Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118 (AMT), Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118 (AMT), Sch C, Part I: 12	0	0	0
Other Tax Deemed Paid @ 1118 (AMT), Sch C, Part II: 8(b)+III:8	255,912	255,912	0
Total Tax Deemed Paid	255,912	255,912	0

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Federal Total Tax

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
TAXABLE INCOME:			
Taxable Income	14,115,445,977	36,309,030,949	22,193,584,972
FEDERAL INCOME TAX:			
Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Alternative Capital Gains Tax	n/a	n/a	0
Income Tax Before Adjustment	4,940,406,092	12,708,160,832	7,767,754,740
Adjustment to Fed Inc Tax	0	0	0
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
FEDERAL TOTAL TAX:			
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Pre-2018 Alternative Minimum Tax	0	0	0
Post-2022 Alternative Minimum Tax	n/a	n/a	0
Base Erosion Minimum Tax Amount	n/a	n/a	0
Federal Income Tax Plus Minimum Tax	4,940,406,092	12,708,160,832	7,767,754,740
Less Foreign Tax Credit	440,058,880	478,051,150	37,992,270
Other Subpart B Credits	0	0	0
General Business Credit	591,951,898	565,680,537	(26,271,361)
Min Tax Credit/Bond Credits	54,883,684	54,883,684	0
Plus Other Taxes & Interest	0	0	0
Federal Total Tax	3,853,511,630	11,609,545,461	7,756,033,831

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Pre-2018 Alternative Minimum Tax

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	No	No
PRE-2018 TENTATIVE MINIMUM TAX:			
Pre-2018 Alternative Minimum Taxable Income	13,995,927,054	36,189,512,026	22,193,584,972
Short Period Annualization	1	1	0
Pre-2018 AMTI - Annualized	13,995,927,054	36,189,512,026	22,193,584,972
Less: Exemption	0	0	0
Excess Pre-2018 AMTI	13,995,927,054	36,189,512,026	22,193,584,972
Pre-Credit TMT Before Fraction	2,799,185,411	7,237,902,405	4,438,716,994
Pre-2018 Fraction	n/a	n/a	0
Pre-Credit TMT	2,799,185,411	7,237,902,405	4,438,716,994
Pre-2005 Overall AMT FTC Limit	2,799,185,411	7,237,902,405	4,438,716,994
Pre-2018 AMT FTC	440,058,880	372,679,559	(67,379,321)
Pre-2018 TMT - Annualized	2,359,126,531	6,865,222,846	4,506,096,315
Short Period Un-Annualization	1	1	0
Pre-2018 Tentative Minimum Tax	2,359,126,531	6,865,222,846	4,506,096,315
REGULAR TAX:			
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Less FTC/Possessions Credit	440,058,880	478,051,150	37,992,270
Regular Tax After FTC	4,500,347,212	12,230,109,682	7,729,762,470
PRE-2018 ALTERNATIVE MINIMUM TAX:			
Pre-2018 AMT Before Adjustment	0	0	0
Adjustment to Pre-2018 AMT	0	0	0
Pre-2018 Alternative Minimum Tax	0	0	0

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Pre-2018 Alternative Minimum Taxable Income

Year Ending:	12-31-2017		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	No	No
PREADJUSTMENT PRE-2018 AMTI:			
Regular Taxable Income Before S199	14,115,445,977	36,309,030,949	22,193,584,972
Add: Regular NOL Deduction	37,622,233	35,555,565	(2,066,668)
Taxable Income Before Regular NOLD	14,153,068,210	36,344,586,514	22,191,518,304
Add: Adjustments/Preference Items Before S199	(119,518,893)	(119,518,893)	0
Preadjustment Pre-2018 AMTI	14,033,549,317	36,225,067,621	22,191,518,304
ADJUSTMENTS:			
Pre-2018 ACE Adjustment	0	0	0
Pre-2018 AMTI Before AMT NOLD	14,033,549,317	36,225,067,621	22,191,518,304
PRE-2018 AMT NET OPERATING LOSS:			
S382 Pre-2018 AMT NOL COs Allowed	0	0	0
Non-S382 Pre-2018 AMT NOL Carryovers	37,622,263	35,555,595	(2,066,668)
Pre-2018 AMT NOL Carrybacks	0	0	0
Pre-2018 AMT NOLD Limitation	37,622,263	35,555,595	(2,066,668)
Pre-2018 AMT NOL Deduction	37,622,263	35,555,595	(2,066,668)
PRE-2018 ALTERNATIVE MINIMUM TAXABLE INCOME:			
Pre-2018 AMTI Before Section 199 Deduction	13,995,927,054	36,189,512,026	22,193,584,972
Less: S199 Deduction for Pre-2018 AMTI	0	0	0
Pre-2018 AMTI Before Other	13,995,927,054	36,189,512,026	22,193,584,972
Add: Other Pre-2018 AMTI	0	0	0
Pre-2018 Alternative Minimum Taxable Income	13,995,927,054	36,189,512,026	22,193,584,972

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
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Summary of FTC Allowed

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
FTC ALLOWED:			
Cat 1 General Limitation Income	439,802,968	477,795,238	37,992,270
Cat 2 Passive Income	255,912	255,912	0
Total FTC Before Boycott	440,058,880	478,051,150	37,992,270
Add: Adjustment	0	0	0
Less: Boycott Reduction	0	0	0
Total FTC Allowed	440,058,880	478,051,150	37,992,270
DIVIDEND GROSS-UP FROM CATEGORIES (S78):			
Cat 1 General Limitation Income	286,492,526	291,171,538	4,679,012
Cat 2 Passive Income	255,912	255,912	0
Total Gross-up from Categories	286,748,438	291,427,450	4,679,012

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----- FTC Allowed - Category 1: General Limitation Income -----

Year Ending for FTC Category 1:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
FTC AVAILABLE:			
Current FTC	439,802,968	372,423,647	(67,379,321)
FTC Carryover	0	0	0
FTC Carryback	0	105,371,591	105,371,591
Total FTC Available	439,802,968	477,795,238	37,992,270
FTC FRACTION:			
Numerator:			
Numerator Before Increase	11,590,959,273	14,193,028,734	2,602,069,461
Increase	n/a	n/a	0
Numerator of Fraction	11,590,959,273	14,193,028,734	2,602,069,461
Denominator:			
Taxable Income	14,115,445,977	36,309,030,949	22,193,584,972
Adjustments	0	0	0
Denominator of Fraction	14,115,445,977	36,309,030,949	22,193,584,972
Limitation Fraction	.821154308	.390895278	-.43025903
NET TAX LIABILITY:			
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Add: Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less: Possessions Credit	0	0	0
Net Tax Liability	4,940,406,092	12,708,160,832	7,767,754,740
FTC LIMITATION:			
Section 904 Limitation	4,056,835,746	4,967,560,061	910,724,315
Limitation Adjustment	0	0	0
FTC Limitation	4,056,835,746	4,967,560,061	910,724,315
FTC ALLOWED:			
FTC Allowed Before Adjustment	439,802,968	477,795,238	37,992,270
Adjustment to FTC Allowed	0	0	0
FTC Allowed	439,802,968	477,795,238	37,992,270
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	3,617,032,778	4,489,764,823	872,732,045

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EIN [REDACTED]

FTC Allowed - Category 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
FTC AVAILABLE:			
Current FTC	255,912	255,912	0
FTC Carryover	0	0	0
FTC Carryback	0	0	0
Total FTC Available	255,912	255,912	0
FTC FRACTION:			
Numerator:			
Numerator Before Increase	122,138,803	136,576,151	14,437,348
Increase	n/a	n/a	0
Numerator of Fraction	122,138,803	136,576,151	14,437,348
Denominator:			
Taxable Income	14,115,445,977	36,309,030,949	22,193,584,972
Adjustments	0	0	0
Denominator of Fraction	14,115,445,977	36,309,030,949	22,193,584,972
Limitation Fraction	.008652848	.003761493	-.004891355
NET TAX LIABILITY:			
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Add: Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less: Possessions Credit	0	0	0
Net Tax Liability	4,940,406,092	12,708,160,832	7,767,754,740
FTC LIMITATION:			
Section 904 Limitation	42,748,583	47,801,658	5,053,075
Limitation Adjustment	0	0	0
FTC Limitation	42,748,583	47,801,658	5,053,075
FTC ALLOWED:			
FTC Allowed Before Adjustment	255,912	255,912	0
Adjustment to FTC Allowed	0	0	0
FTC Allowed	255,912	255,912	0
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	42,492,671	47,545,746	5,053,075

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EM [REDACTED]

FTC Absorbed - Category 1: General Limitation Income

	[12-31-2005]			[12-31-2006]			[12-31-2007]			[12-31-2008]
Year Ending for FTC Category 1:	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965
CURRENT:										
Current Foreign Tax Credit Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0
EXPIRED/UNUSED:										
Expired Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0
	[12-31-2008]		[12-31-2009]		[12-31-2010]		[12-31-2011]			
Year Ending for FTC Category 1:	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)
CURRENT:										
Current Foreign Tax Credit Absorbed in Current Year	0	0	n/a	0	0	n/a	0	0	n/a	0
EXPIRED/UNUSED:										
Expired Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0
	[12-31-2011]	[12-31-2012]		[12-31-2013]		[12-31-2014]				
Year Ending for FTC Category 1:	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3
CURRENT:										
Current Foreign Tax Credit Absorbed in Current Year	0	0	n/a	0	0	n/a	0	0	n/a	0
EXPIRED/UNUSED:										
Expired Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0
	[12-31-2015]			[12-31-2016]			12-31-2017			
Year Ending for FTC Category 1:	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	
CURRENT:										
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	439,802,968	372,423,647	(67,379,321)	
EXPIRED/UNUSED:										
Expired Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	

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FTC Absorbed - Category 2, Passive Income

Year Ending for FTC Category 2:	[12-31-2005]			[12-31-2006]			[12-31-2007]			[12-31-2008]
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965
CURRENT:										
Current Foreign Tax Credit Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0
EXPIRED/UNUSED:										
Expired	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0

Year Ending for FTC Category 2:	[12-31-2008]		[12-31-2009]		[12-31-2010]		[12-31-2011]	
	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3
CURRENT:								
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:								
Expired	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0

Year Ending for FTC Category 2:	[12-31-2011]		[12-31-2012]		[12-31-2013]		[12-31-2014]	
	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965
CURRENT:								
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:								
Expired	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0

Year Ending for FTC Category 2:	[12-31-2015]			[12-31-2016]			12-31-2017		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3
CURRENT:									
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	255,912	255,912	0
EXPIRED/UNUSED:									
Expired	n/a	n/a	n/a	n/a	n/a	n/a	255,912	255,912	0
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0

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----- FTC Numerator - Category 1 General Limitation Income -----

Year Ending for FTC Category 1	===== 12-31-2017 =====		
	3 w/965	6 AllAdj(w/965)	Diff: 6-3
Foreign Income or Loss	9,204,425,705	9,159,469,470	(44,956,235)
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	9,204,425,705	9,159,469,470	(44,956,235)
Subtotal B	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	2,386,533,568	5,033,559,264	2,647,025,696
Numerator Before Carryback	11,590,959,273	14,193,028,734	2,602,069,461
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	0
Increase/Decrease Due To			
NOL Carryback From			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	11,590,959,273	14,193,028,734	2,602,069,461
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

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FTC: Numerator - Category 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
Foreign Income or Loss	106,324,469	106,324,469	0
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	106,324,469	106,324,469	0
Subtotal B	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	15,814,334	30,251,682	14,437,348
Numerator Before Carryback	122,138,803	136,576,151	14,437,348
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	0
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	122,138,803	136,576,151	14,437,348
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

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EIN [REDACTED]

FTC: Denominator

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
Taxable Income/NOL Generated	14,115,445,977	36,309,030,949	22,193,584,972
Add: NOL Deduction	37,622,233	35,555,565	(2,066,668)
US Income Increase/Decrease	0	0	0
Adjust for FTC Deducted	0	0	0
Less: Foreign Income/Loss	9,310,750,174	9,265,793,939	(44,956,235)
US Inc/Loss Before US NOL	4,842,318,036	27,078,792,575	22,236,474,539
Less: US NOL COs Utilized	37,622,233	35,555,565	(2,066,668)
US Source Income/Loss	4,804,695,803	27,043,237,010	22,238,541,207
US Source Income/Loss After S904(b);	4,804,695,803	27,043,237,010	22,238,541,207
US Subtotal A	4,804,695,803	27,043,237,010	22,238,541,207
US Subtotal B	4,804,695,803	27,043,237,010	22,238,541,207
Recapture ODLs:			
Cat 1: General Limitation Income	(2,386,533,568)	(5,033,559,264)	(2,647,025,696)
Cat 2: Passive Income	(15,814,334)	(30,251,682)	(14,437,348)
US Subtotal C	2,402,347,901	21,979,426,064	19,577,078,163
Increase/Decrease Due To NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
US Income/Loss	2,402,347,901	21,979,426,064	19,577,078,163
Sum of Numerators	11,713,098,076	14,329,604,885	2,616,506,809
Denominator of Limitation Fraction:			
Denominator Before Increase	14,115,445,977	36,309,030,949	22,193,584,972
Increase Due to S904(b)(4)	0	0	0
Denominator After Increase	14,115,445,977	36,309,030,949	22,193,584,972

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
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EIN [REDACTED]

FTC: Schedule J, Part I - 12-31-2017

FTC Categories for Year Ending 12-2017:	Cat 1			Cat 2		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3
Foreign Income or Loss	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
Less: Foreign NOL Carryover Utilized	0	0	0	0	0	0
Subtotal A	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0	0
Subtotal A After S904(b)	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
Subtotal B	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a	n/a	n/a	n/a
Allocate OFLs	0	0	0	0	0	0
Allocate ODLs	0	0	0	0	0	0
Subtotal C	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a	n/a	n/a	n/a
Recapture OFLs	0	0	0	0	0	0
Subtotal D	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a	n/a	n/a	n/a
Subtotal E	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a	n/a	n/a	n/a
Recapture ODLs	2,386,533,568	5,033,559,264	2,647,025,696	15,814,334	30,251,682	14,437,348
Numerator Before Carryback	11,590,959,273	14,193,028,734	2,602,069,461	122,138,803	136,576,151	14,437,348
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	0	n/a	n/a	0
Increase/Decrease Due To NOL Carryback From:						
1st Following Year	0	0	0	0	0	0
2nd Following Year	0	0	0	0	0	0
Numerator of Limit Fraction	11,590,959,273	14,193,028,734	2,602,069,461	122,138,803	136,576,151	14,437,348
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

FTC: Losses to be Recaptured - Cat 1: General Limitation Income

Year Ending for FTC Category 1:	===== 12-31-2017 =====		
	3. w/965	6 AllAdj(w/965)	Diff: 6-3
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	4,649,150,629	5,033,559,264	384,408,635
Adjustment to Beginning Balance	0	0	0
Beginning Balance	4,649,150,629	5,033,559,264	384,408,635
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	4,649,150,629	5,033,559,264	384,408,635
Less: Current Year Recapture	2,386,533,568	5,033,559,264	2,647,025,696
Bonus Recapture 2018-2027	n/a	n/a	n/a
ODL Ending Balance	2,262,617,061	0	(2,262,617,061)
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	4,649,150,629	5,033,559,264	384,408,635
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	4,649,150,629	5,033,559,264	384,408,635
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	4,649,150,629	5,033,559,264	384,408,635
Less: Pre-2018 Current Year Recapture	2,386,533,568	5,033,559,264	2,647,025,696
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	2,262,617,061	0	(2,262,617,061)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
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EIN [REDACTED]

----- FTC: Losses to be Recaptured - Cat 2: Passive Income -----

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff 6-3
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	30,807,537	30,251,682	(555,855)
Adjustment to Beginning Balance	0	0	0
Beginning Balance	30,807,537	30,251,682	(555,855)
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	30,807,537	30,251,682	(555,855)
Less: Current Year Recapture	15,814,334	30,251,682	14,437,348
Bonus Recapture 2018-2027	n/a	n/a	n/a
ODL Ending Balance	14,993,203	0	(14,993,203)
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	30,807,537	30,251,682	(555,855)
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	30,807,537	30,251,682	(555,855)
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	30,807,537	30,251,682	(555,855)
Less Pre-2018 Current Year Recapture	15,814,334	30,251,682	14,437,348
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	14,993,203	0	(14,993,203)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

FTC: Schedule J, Parts II-IV - 12-31-2017

FTC Categories for Year Ending 12-2017:	===== Cat 1 =====			===== Cat 2 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6 AllAdj(w/965)	Diff: 6-3
Overall Foreign Loss (OFL) Account:						
OFL Beginning Balance:						
Balance Before Adjustment	0	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0	0
Beginning Balance	0	0	0	0	0	0
Current Year Additions	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0
OFL Subtotal	0	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0	0
OFL Ending Balance	0	0	0	0	0	0
Overall Domestic Loss (ODL) Account:						
Beginning Balance:						
Balance Before Adjustment	4,649,150.629	5,033,559.264	384,408.635	30,807,537	30,251,682	(555.855)
Adjustment to Beginning Balance	0	0	0	0	0	0
Beginning Balance	4,649,150.629	5,033,559.264	384,408.635	30,807,537	30,251,682	(555.855)
Current Year Additions	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0
ODL Subtotal	4,649,150.629	5,033,559.264	384,408.635	30,807,537	30,251,682	(555.855)
Less: Current Year Recapture	2,386,533.568	5,033,559.264	2,647,025.696	15,814,334	30,251,682	14,437,348
Bonus Recapture 2018-2027	n/a	n/a	n/a	n/a	n/a	n/a
ODL Ending Balance	2,262,617.061	0	(2,262,617.061)	14,993,203	0	(14,993,203)
Pre-2018 Portion of ODL Account:						
Pre-2018 Beginning Balance:						
Pre-2018 Balance Before Adjustment	4,649,150.629	5,033,559.264	384,408.635	30,807,537	30,251,682	(555.855)
Pre-2018 Adjustment to Beginning Balance	0	0	0	0	0	0
Pre-2018 Beginning Balance	4,649,150.629	5,033,559.264	384,408.635	30,807,537	30,251,682	(555.855)
Pre-2018 Current Year Additions	0	0	0	0	0	0
Pre-2018 Current Year Reductions	0	0	0	0	0	0
Pre-2018 ODL Subtotal	4,649,150.629	5,033,559.264	384,408.635	30,807,537	30,251,682	(555.855)
Less: Pre-2018 Current Year Recapture	2,386,533.568	5,033,559.264	2,647,025.696	15,814,334	30,251,682	14,437,348
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	2,262,617.061	0	(2,262,617.061)	14,993,203	0	(14,993,203)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Summary of Pre-2018 AMT FTC Allowed

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
AMT FTC ALLOWED:			
Cat 1: General Limitation Income	439,802,968	372,423,647	(67,379,321)
Cat 2: Passive Income	255,912	255,912	0
Total AMT FTC Before Adjustments	440,058,880	372,679,559	(67,379,321)
Add: Adjustment	0	0	0
Less: Boycott Reduction	0	0	0
Total AMT FTC Allowed	440,058,880	372,679,559	(67,379,321)
AMT FTC GROSS-UP FROM CATEGORIES (S78):			
Cat 1: General Limitation Income	286,492,526	291,171,538	4,679,012
Cat 2: Passive Income	255,912	255,912	0
Total AMT FTC Gross-up	286,748,438	291,427,450	4,679,012
Less: Total Regular FTC Gross-up	286,748,438	291,427,450	4,679,012

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC Allowed - Category 1: General Limitation Income

Year Ending for FTC Category 1:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff 6-3
AMT FTC AVAILABLE:			
Current AMT FTC	439,802,968	372,423,647	(67,379,321)
AMT FTC Carryover	0	0	0
AMT FTC Carryback	0	0	0
Total AMT FTC Available	439,802,968	372,423,647	(67,379,321)
AMT FTC FRACTION:			
Numerator of Fraction	11,532,981,206	13,429,186,617	1,896,205,411
Alt Min Taxable Income	13,995,927,054	36,189,512,026	22,193,584,972
Adjustments	0	0	0
Denominator of Fraction	13,995,927,054	36,189,512,026	22,193,584,972
Limitation Fraction	.824024101	.371079516	-.452944585
NET PRE-CREDIT TMT:			
Pre-Credit TMT	2,799,185,411	7,237,902,405	4,438,716,994
Add: TMT Adjustment	0	0	0
TMT on FTC Deducted	n/a	n/a	0
Net Pre-Credit TMT	2,799,185,411	7,237,902,405	4,438,716,994
AMT FTC LIMITATION:			
Section 904 Limitation	2,306,596,242	2,685,837,321	379,241,079
Limitation Adjustment	0	0	0
AMT FTC Limitation	2,306,596,242	2,685,837,321	379,241,079
AMT FTC ALLOWED BEFORE ADJUSTMENT:			
AMT FTC Before Overall Limitation	439,802,968	372,423,647	(67,379,321)
Less: Beyond Overall Limitation	0	0	0
AMT FTC Allowed Before Adjust	439,802,968	372,423,647	(67,379,321)
TOTAL AMT FTC ALLOWED:			
AMT FTC Allowed Before Adjust	439,802,968	372,423,647	(67,379,321)
Adjustment to AMT FTC Allowed	0	0	0
Total AMT FTC Allowed	439,802,968	372,423,647	(67,379,321)
EXCESS AMT FTC LIMITATION:			
Excess AMT FTC Available	0	0	0
Excess AMT FTC Limitation	1,866,793,274	2,313,413,674	446,620,400

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC Allowed - Category 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
AMT FTC AVAILABLE:			
Current AMT FTC	255,912	255,912	0
AMT FTC Carryover	0	0	0
AMT FTC Carryback	0	0	0
Total AMT FTC Available	255,912	255,912	0
AMT FTC FRACTION:			
Numerator of Fraction	120,357,408	132,055,734	11,698,326
All Min Taxable Income	13,995,927,054	36,189,512,026	22,193,584,972
Adjustments	0	0	0
Denominator of Fraction	13,995,927,054	36,189,512,026	22,193,584,972
Limitation Fraction	.00859946	.003649006	-.004950454
NET PRE-CREDIT TMT:			
Pre-Credit TMT	2,799,185,411	7,237,902,405	4,438,716,994
Add TMT Adjustment	0	0	0
TMT on FTC Deducted	n/a	n/a	0
Net Pre-Credit TMT	2,799,185,411	7,237,902,405	4,438,716,994
AMT FTC LIMITATION:			
Section 904 Limitation	24,071,483	26,411,149	2,339,666
Limitation Adjustment	0	0	0
AMT FTC Limitation	24,071,483	26,411,149	2,339,666
AMT FTC ALLOWED BEFORE ADJUSTMENT:			
AMT FTC Before Overall Limitation	255,912	255,912	0
Less: Beyond Overall Limitation	0	0	0
AMT FTC Allowed Before Adjust	255,912	255,912	0
TOTAL AMT FTC ALLOWED:			
AMT FTC Allowed Before Adjust	255,912	255,912	0
Adjustment to AMT FTC Allowed	0	0	0
Total AMT FTC Allowed	255,912	255,912	0
EXCESS AMT FTC LIMITATION:			
Excess AMT FTC Available	0	0	0
Excess AMT FTC Limitation	23,815,571	26,155,237	2,339,666

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TAX YEARS 2017-12 (SECTION 965)
EIN: [REDACTED]

Pre-2018 AMT FTC Absorbed - Category 1 - General Limitation Income

Year Ending for FTC Category 1:	[12-31-2005]			[12-31-2006]			[12-31-2007]			[12-31-2008]	
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)
CURRENT:											
Current AMT FTC Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
EXPIRED/UNUSED:											
Expired	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 1:	[12-31-2008]		[12-31-2009]		[12-31-2010]		[12-31-2011]				
	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	
CURRENT:											
Current AMT FTC Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0	0	
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	
Year Ending for FTC Category 1:	[12-31-2011]		[12-31-2012]		[12-31-2013]		[12-31-2014]				
	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	
CURRENT:											
Current AMT FTC Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0	0	
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	
Year Ending for FTC Category 1:	[12-31-2015]		[12-31-2016]		[12-31-2017]						
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	
CURRENT:											
Current AMT FTC Absorbed in Current Year	0	0	0	0	0	0	439,802,968	372,423,647	(67,379,321)	0	
EXPIRED/UNUSED:											
Expired	n/a	n/a	n/a	n/a	n/a	n/a	439,802,968	372,423,647	(67,379,321)	0	
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	

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EIN [REDACTED]

Pre-2018 AMT FTC Absorbed - Category 2: Passive Income

	[12-31-2005]			[12-31-2006]			[12-31-2007]			[12-31-2008]
Year Ending for FTC Category 2:	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965
CURRENT:										
Current AMT FTC	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:										
Expired	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0
	[12-31-2008]			[12-31-2009]			[12-31-2010]			[12-31-2011]
Year Ending for FTC Category 2: 6: AllAdj(w/965)		Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)
CURRENT:										
Current AMT FTC	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:										
Expired	0	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0
	[12-31-2011]	[12-31-2012]			[12-31-2013]			[12-31-2014]		
Year Ending for FTC Category 2:	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3
CURRENT:										
Current AMT FTC	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:										
Expired	0	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0
	[12-31-2015]			[12-31-2016]			12-31-2017			
Year Ending for FTC Category 2:	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3: w/965	6: AllAdj(w/965)	Diff: 6-3	
CURRENT:										
Current AMT FTC	0	0	0	0	0	0	255,912	255,912	0	
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	255,912	255,912	0	
EXPIRED/UNUSED:										
Expired	0	0	0	0	0	0	0	0	0	
Unused AMT FTC	0	0	0	0	0	0	0	0	0	

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC Numerator - Category 1 General Limitation Income

Year Ending for FTC Category 1	===== 12-31-2017 =====		
	3: w/965	6: AIAAdj(w/965)	Diff: 6-3
Foreign AMTI	9,204,425,705	9,159,469,470	(44,956,235)
Less: Foreign AMT NOL CO Abs	0	0	0
Subtotal A	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	9,204,425,705	9,159,469,470	(44,956,235)
Subtotal B	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	9,204,425,705	9,159,469,470	(44,956,235)
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	2,328,555,501	4,269,717,147	1,941,161,646
Numerator Before Carryback	11,532,981,206	13,429,186,617	1,896,205,411
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	11,532,981,206	13,429,186,617	1,896,205,411
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC: Numerator - Category 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff 6-3
Foreign AMTI	106,324,469	106,324,469	0
Less: Foreign AMT NOL CO Abs	0	0	0
Subtotal A	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	106,324,469	106,324,469	0
Subtotal B	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	14,032,939	25,731,265	11,698,326
Numerator Before Carryback	120,357,408	132,055,734	11,698,326
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	120,357,408	132,055,734	11,698,326
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC: Denominator

Year Ending	12-31-2017		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
AMTWAMT NOL Generated	13,995,927,054	36,189,512,026	22,193,584,972
Add: AMT NOL Deduction	37,622,263	35,555,595	(2,066,668)
US AMTI Adjustment	0	0	0
Adjust for FTC Deducted	0	0	0
Less: Foreign Income/Loss	9,310,750,174	9,265,793,939	(44,956,235)
US Inc/Loss Before US NOL	4,722,799,143	26,959,273,682	22,236,474,539
Less: US AMT NOL COs Absorbed	37,622,263	35,555,595	(2,066,668)
US Source AMTI	4,685,176,880	26,923,718,087	22,238,541,207
US Source Income/Loss After S904(b)	4,685,176,880	26,923,718,087	22,238,541,207
US Subtotal A	4,685,176,880	26,923,718,087	22,238,541,207
US Subtotal B	4,685,176,880	26,923,718,087	22,238,541,207
Recapture ODLs			
Cat 1: General Limitation Income	(2,328,555,501)	(4,269,717,147)	(1,941,161,646)
Cat 2: Passive Income	(14,032,939)	(25,731,265)	(11,698,326)
US Subtotal C	2,342,588,440	22,628,269,675	20,285,681,235
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
US AMTI	2,342,588,440	22,628,269,675	20,285,681,235
Sum of Numerators	11,653,338,614	13,561,242,351	1,907,903,737
Denominator of Fraction	13,995,927,054	36,189,512,026	22,193,584,972

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC Schedule J, Part I - 12-31-2017

FTC Categories for Year Ending 12-2017:	Cat 1			Cat 2		
	3. w/965	6. AllAdj(w/965)	Diff. 6-3	3. w/965	6. AllAdj(w/965)	Diff. 6-3
Foreign AMTI	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
Less: Foreign AMT NOL CO Abs	0	0	0	0	0	0
Subtotal A	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0	0
Subtotal A After S904(b)	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
Subtotal B	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a	n/a	n/a	n/a
Allocate OFLs	0	0	0	0	0	0
Allocate ODLs	0	0	0	0	0	0
Subtotal C	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a	n/a	n/a	n/a
Recapture OFLs	0	0	0	0	0	0
Subtotal D	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a	n/a	n/a	n/a
Subtotal E	9,204,425,705	9,159,469,470	(44,956,235)	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a	n/a	n/a	n/a
Recapture ODLs	2,328,555,501	4,269,717,147	1,941,161,646	14,032,939	25,731,265	11,698,326
Numerator Before Carryback	11,532,981,206	13,429,186,617	1,896,205,411	120,357,408	132,055,734	11,698,326
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	n/a	n/a	n/a	n/a
Increase/Decrease Due To						
NOL Carryback From:						
1st Following Year	0	0	0	0	0	0
2nd Following Year	0	0	0	0	0	0
Numerator of Limit Fraction	11,532,981,206	13,429,186,617	1,896,205,411	120,357,408	132,055,734	11,698,326
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

----- Pre-2018 AMT FTC: Losses to be Recaptured - Cat 1 General Limitation Income -----

Year Ending for FTC Category 1	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff 6-3
Overall Foreign Loss (OFL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	4,269,717,147	4,269,717,147	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	4,269,717,147	4,269,717,147	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	4,269,717,147	4,269,717,147	0
Less: Current Year Recapture	2,328,555,501	4,269,717,147	1,941,161,646
ODL Ending Balance	1,941,161,646	0	(1,941,161,646)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC Losses to be Recaptured - Cat 2 Passive Income

Year Ending for FTC Category 2	===== 12-31-2017 =====		
	3 w/965	6 AllAdj(w/965)	Diff 6-3
Overall Foreign Loss (OFL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	25,731,265	25,731,265	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	25,731,265	25,731,265	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	25,731,265	25,731,265	0
Less: Current Year Recapture	14,032,939	25,731,265	11,698,326
ODL Ending Balance	11,698,326	0	(11,698,326)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Pre-2018 AMT FTC: Schedule J, Parts II-IV - 12-31-2017

FTC Categories for Year Ending 12-2017:	===== Cat 1 =====			===== Cat 2 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3	3 w/965	6: AllAdj(w/965)	Diff: 6-3
Overall Foreign Loss (OFL) Account:						
Beginning Balance:						
Balance Before Adjustment	0	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0	0
Beginning Balance	0	0	0	0	0	0
Current Year Additions	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0
Subtotal	0	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0	0
Ending Balance	0	0	0	0	0	0
Overall Domestic Loss (ODL) Account:						
Beginning Balance:						
Balance Before Adjustment	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0
Adjustment to Beginning Balance	0	0	0	0	0	0
Beginning Balance	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0
Current Year Additions	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0
ODL Subtotal	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0
Less: Current Year Recapture	2,328,555,501	4,269,717,147	1,941,161,646	14,032,939	25,731,265	11,698,326
ODL Ending Balance	1,941,161,646	0	(1,941,161,646)	11,698,326	0	(11,698,326)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

General Business Credit - Summary

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AllAdj(w/965)	Diff: 6-3
STANDARD GBC GENERATED THIS YEAR:			
Current Standard GBC	343,542,421	317,271,060	(26,271,361)
Less: Allowed This Year	343,542,421	317,271,060	(26,271,361)
Available for CO/CB	0	0	0
ABSORBED BY CO/CB TO CURRENT YEARS:			
Carryovers and Carrybacks <From>/To:			
From [12-2014]	54,440	54,440	0
From [12-2015]	25,757,999	25,757,999	0
From [12-2016]	222,249,404	222,249,404	0
STANDARD GBC ALLOWED THIS YEAR:			
Standard GBC Limitation	2,141,220,681	5,364,886,836	3,223,666,155
Standard GBC Allowed This Year:			
Refundable Standard GBC	n/a	n/a	0
Nonrefundable Standard GBC			
From This Year	343,542,421	317,271,060	(26,271,361)
From Other Years	248,061,843	248,061,843	0
Total Nonfundable	591,604,264	565,332,903	(26,271,361)
TOTAL GBC ALLOWED THIS YEAR:			
Nonrefundable Standard GBC Allowed	591,604,264	565,332,903	(26,271,361)
Zone Credits Allowed	0	0	0
Specified Credits Allowed	347,634	347,634	0
Eligible Small Business Credits Allowed	0	0	0
Total GBC Before Adjustment	591,951,898	565,680,537	(26,271,361)
Adjustment to Total GBC	0	0	0
Total Nonrefundable GBC Allowed	591,951,898	565,680,537	(26,271,361)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)

EIN [REDACTED]

General Business Credit Allowed

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AltAdj(w/965)	Diff: 6-3
STANDARD GBC AVAILABLE:			
Current Standard GBC	343,542,421	317,271,060	(26,271,361)
Standard GBC Carryover	248,061,843	248,061,843	0
Standard GBC Carryback	0	0	0
Total Standard GBC Available	591,604,264	565,332,903	(26,271,361)
STANDARD GBC LIMITATION:			
Net Income Tax:			
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Pre-2018 Alternative Minimum Tax	0	0	0
Post-2022 Alternative Minimum Tax	n/a	n/a	0
Less: Subpart B Credits	440,058,880	478,051,150	37,992,270
Net Income Tax	4,500,347,212	12,230,109,682	7,729,762,470
Net Regular Tax:			
Federal Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
Less: Subpart B Credits	440,058,880	478,051,150	37,992,270
Net Regular Tax	4,500,347,212	12,230,109,682	7,729,762,470
Standard GBC Limitation:			
Net Income Tax	4,500,347,212	12,230,109,682	7,729,762,470
Less: Greater of -			
Pre-2018 Tentative Minimum Tax	2,359,126,531	6,865,222,846	4,506,096,315
25% x (Net Regular Tax - \$25,000)	1,125,080,553	3,057,521,171	1,932,440,618
25% x (Net Income Tax - \$25,000)	n/a	n/a	0
Normal GBC Limit	2,141,220,681	5,364,886,836	3,223,666,155
Add: Former Section 38(c)(2)	0	0	0
GBC Limit Before S168(k)(4)	2,141,220,681	5,364,886,836	3,223,666,155
Add: S168(k)(4) Additional GBC Limitation			
Election I (2008-09):	n/a	n/a	0
Election II (2009-10):	n/a	n/a	0
Standard GBC Limitation	2,141,220,681	5,364,886,836	3,223,666,155
TOTAL STANDARD GBC ALLOWED:			
Standard GBC Allowed	591,604,264	565,332,903	(26,271,361)
Less: Nonrefundable Standard GBC Allowed	591,604,264	565,332,903	(26,271,361)
Refundable Standard GBC Allowed	n/a	n/a	0
TOTAL GENERAL BUSINESS CREDIT ALLOWED:			
Nonrefundable Standard GBC Allowed	591,604,264	565,332,903	(26,271,361)
Zone Credits Allowed	0	0	0
Specified Credits Allowed	347,634	347,634	0
Eligible Small Business Credits Allowed	0	0	0
Total GBC Before Adjustment	591,951,898	565,680,537	(26,271,361)
Adjustment to Total GBC	0	0	0
Total General Business Credit Allowed	591,951,898	565,680,537	(26,271,361)

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965)
EIN [REDACTED]

Minimum Tax Credit Allowed

Year Ending:	===== 12-31-2017 =====		
	3: w/965	6: AltAd;(w/965)	Diff: 6-3
ELECT FULL REFUND FOR 2018:			
Elect Full Refund for 2018 (Y/N) (S53(e)(5))	n/a	n/a	No
MTC GENERATED THIS YEAR:			
Net Minimum Tax	0	0	0
Plus Credits Disallowed:			
Orphan Drug (Pre-1995)	0	0	0
Nonconventional Fuel (Pre-2006)	0	0	0
Qualified Electric Vehicle (Pre-2007)	0	0	0
MTC Generated This Year	0	0	0
MTC LIMITATION FOR THIS YEAR:			
Regular Income Tax	4,940,406,092	12,708,160,832	7,767,754,740
BEAT	0	0	0
Regular Income Tax Plus BEAT	0	0	0
Less Non-Bond Credits	1,032,010,778	1,043,731,687	11,720,909
Regular Tax After Credits	3,908,395,314	11,664,429,145	7,756,033,831
Regular Tax Plus BEAT After Credits	0	0	0
Less Pre-2018 Tentative Minimum Tax	2,359,126,531	6,865,222,846	4,506,096,315
Less Post-2022 Tentative Minimum Tax	0	0	0
MTC Limitation Before S55(e)Restrictions	1,549,268,783	4,799,206,299	3,249,937,516
Net Change Due to S55(e)Restrictions	0	0	0
MTC Limitation After S55(e)Restrictions	1,549,268,783	4,799,206,299	3,249,937,516
Increase/Decrease MTC Limit	0	0	0
Preliminary MTC Limitation (Pre-2018)	1,549,268,783	4,799,206,299	3,249,937,516
Preliminary MTC Limitation (Post-2023)	0	0	0
MTC Limitation After S168(k)(4):			
Preliminary MTC Limitation (Pre-2018)	1,549,268,783	4,799,206,299	3,249,937,516
MTC Limitation After S168(k)(4)	1,549,268,783	4,799,206,299	3,249,937,516
MTC ALLOWED THIS YEAR:			
MTC from Previous Year	54,883,684	54,883,684	0
MTC Limitation	1,549,268,783	4,799,206,299	3,249,937,516
Total MTC Allowed	54,883,684	54,883,684	0
Less Nonrefundable MTC Allowed	54,883,684	54,883,684	0
Refundable MTC Allowed This Year	n/a	n/a	0
MTC AVAILABLE FOR NEXT YEAR:			
MTC to Next Year Before Adjustment	0	0	0
Increase/Decrease MTC to Next Year	0	0	0
MTC Available for Next Year	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Main Worksheet - Input

IRS Form/Lines: Tax Year Begins in 2017	12-31-2017		Diff	
	5: AIAAdj(w/o965)	6: AIAAdj(w/965)		
CONTROLLED GROUP:				
Member of Controlled Group	@ 1120, Sch J: 1	Yes	Yes	No
REGULAR TAXABLE INCOME:				
Total Income	@ 1120: 11	39,418,949,164	48,375,675,869	8,956,726,705
Total Deductions Except S199	@ 1120: 27-25	12,031,089,355	12,031,089,355	0
TI Before NOLD/Special Deductions	@ 1120 28-25	27,387,859,809	36,344,586,514	8,956,726,705
Less: NOL Deduction	@ 1120 29a (See Help)	35,555,565	35,555,565	0
Special Deductions	@ 1120: 29b	0	0	0
Taxable Income Before S199	@ 1120 28-25-29c	27,352,304,244	36,309,030,949	8,956,726,705
Less: Section 199 Deduction (2005-2017)	@ 1120: 25	0	0	0
Add Other Taxable Income	@ 1120 30 (portion)	0	0	0
Regular Taxable Income	@ 1120 30	27,352,304,244	36,309,030,949	8,956,726,705
REGULAR INCOME TAX & MINIMUM TAX:				
Federal Income Tax Before Adjust	@ 1120, Sch J: 2 (portion);	9,573,306,485	12,708,160,832	3,134,854,347
Adjustment to Federal Income Tax	@ 1120, Sch J: 2 (portion)	0	0	0
Federal Income Tax	@ 1120, Sch J: 2	9,573,306,485	12,708,160,832	3,134,854,347
Pre-2018 Alternative Minimum Tax	@ 1120, Sch J: 3	0	0	0
Post-2022 Alternative Minimum Tax		n/a	n/a	0
Base Erosion Minimum Tax Amount		n/a	n/a	0
Federal Income Tax Plus Minimum Tax	@ 1120, Sch J: 4	9,573,306,485	12,708,160,832	3,134,854,347
CREDITS:				
Foreign Tax Credit	@ 1120, Sch J: 5a	195,952,418	478,051,150	282,098,732
Other Subpart B Credits	@ 1120, Sch J: 5b	0	0	0
General Business Credit	@ 1120, Sch J: 5c	565,680,537	565,680,537	0
Minimum Tax Credit/Bond Credits	@ 1120, Sch J: 5d+5e	54,883,684	54,883,684	0
OTHER TAXES:				
Other Taxes & Interest	@ 1120, Sch J: 10	0	0	0
TCJA S965 Transition Tax, Net Tax Liab (2017)	@ 1120, Sch J: 11 (portion)	0	0	0
FEDERAL BALANCE DUE:				
Federal Total Tax	@ 1120 31	8,756,789,846	11,609,545,461	2,852,755,615
Net S965 Tax Liability Paid (2018-2025)		n/a	n/a	0
Less: Payments, Credits, & Net 965 Tax Liab	@ 1120: 32	3,853,511,630	3,853,511,630	0
Plus: Estimated Tax Penalty	@ 1120 33	0	0	0
Federal Balance Due		4,903,278,216	7,756,033,831	2,852,755,615

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)

Dividends and Inclusions - Input

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
TCJA 2017 S965 TRANSITION TAX:			
S965 Inclusion Amount	n/a	n/a	0
S965 Deduction Amount	n/a	n/a	0
DIVIDENDS WITHOUT DRD:			
Subpart F Inc from CFCs @ 1120, Sch C: 14(a)	158,689,453	8,833,317,426	8,674,627,973
GILTI Inclusion	0	0	0
Foreign Dividend Gross-up (S78):			
GILTI S78 Gross-up	0	0	0
Gross-up from Other Categories	9,328,718	291,427,450	282,098,732
Total Gross-Up @ 1120, Sch C: 15(a)	9,328,718	291,427,450	282,098,732
TOTAL DIVIDENDS AND INCLUSIONS:			
Dividends From < 20%-Owned	0	0	0
Dividends From 20%-Owned	0	0	0
TCJA 2017 S965 Inclusion Amount	n/a	n/a	0
Dividends Without DRD	168,018,171	9,124,744,876	8,956,726,705
Dividends and Inclusions @ 1120, Sch C: 19(a)	168,018,171	9,124,744,876	8,956,726,705
SPECIAL DEDUCTIONS:			
Dividends-Received Deduction @ 1120, Sch C: 20-18(c)	0	0	0
TCJA 2017 S965 Deduction Amount	n/a	n/a	0
Dividends Paid Deduction @ 1120, Sch C: 18(c)	0	0	0
Total Special Deductions @ 1120 29b	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Subpart F Inc from CFCs - Custom Input

Year Ending:	***** 12-31-2017 *****		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff. 6-5
From e-File	0	0	0
Subpart F Inc from CFCs	158,689,453	158,689,453	0
965(a) inclusion	0	21,086,452,821	21,086,452,821
965(c) deduction	0	(12,362,189,601)	(12,362,189,601)
Sec 965(a) Inclusion	0	(407,648,525)	(407,648,525)
Sec 965(c) Deduction	0	358,013,278	358,013,278
Subpart F Inclusion	0	0	0
Total	158,689,453	8,833,317,426	8,674,627,973

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Pre-2018 AMT Main Worksheet - Input

IRS Form/Lines: Tax Year Begins in 2017	***** 12-31-2017 *****		
	5: A&Adj(w/o965)	6: A AAdj(w/965)	Diff. 6-5
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	No	No
PRE-2018 ALT MIN TAXABLE INCOME:			
Taxable Income Before S199	@ 1120: 28+25-29a-29b 27,352,304,244	36,309,030,949	8,956,726,705
Add: Regular NOL Deduction	@ 1120: 29a (See Help) 35,555,565	35,555,565	0
TI Before Regular NOLD	@ 4626: 1+1120.25 27,387,859,809	36,344,586,514	8,956,726,705
Add: Adjustments/Preference Items Before S199	@ 4626: 2-2j (See Help) (119,518,893)	(119,518,893)	0
Preadjustment AMTI	@ 4626: 3 (See Help) 27,268,340,916	36,225,067,621	8,956,726,705
Pre-2018 ACE Adjustment	@ 4626 4e 0	0	0
Pre-2018 AMTI Before Energy/NOL	@ 4626: 5 (See Help) 27,268,340,916	36,225,067,621	8,956,726,705
Less: Energy Deduction (1991-1992)	n/a	n/a	0
AMT NOL Deduction	@ 4626: 6 35,555,595	35,555,595	0
AMTI Before Section 199 Deduction	27,232,785,321	36,189,512,026	8,956,726,705
Less: S199 Deduction for AMTI (2005-2017)	0	0	0
Pre-2018 AMTI Before Other	27,232,785,321	36,189,512,026	8,956,726,705
Add: Other AMTI	0	0	0
Pre-2018 Alternative Minimum Taxable Income	@ 4626 7 27,232,785,321	36,189,512,026	8,956,726,705
PRE-2018 ALTERNATIVE MINIMUM TAX:			
Pre-Cred4 TMT	@ 4626: 10 5,446,557,064	7,237,902,405	1,791,345,341
Pre-2018 AMT Foreign Tax Credit	@ 4626: 11 90,580,827	372,679,559	282,098,732
Pre-2018 Tentative Minimum Tax	@ 4626 12 5,355,976,237	6,865,222,846	1,509,246,609
Regular Tax After FTC	@ 4626 13 9,377,354,067	12,230,109,682	2,852,755,615
Pre-2018 AMT Before Adjustment	@ 4626 14 (portion) 0	0	0
Adjustment to AMT	@ 4626: 14 (portion) 0	0	0
Pre-2018 Alternative Minimum Tax	@ 4626: 14 0	0	0
MTC TO NEXT YEAR:			
MTC to Next Year Before Adjust	0	0	0
Adjustment to MTC	0	0	0
MTC Carried to Next Year	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965/965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC Main Worksheet - Input

IRS Form/Lines Tax Year Begins in 2017		5 AMAdj(w/965)	12-31-2017 6 AMAdj(w/965)	Diff 6-5
ELECTIONS:				
Deduct Foreign Tax (Y/N)		No	No	No
Simplified AMT FTC (Y/N)		No	No	No
Apply ODL/OFI Regs Early (2007) (Y/N)		n/a	n/a	No
Pre-2018 ODL Recapture Percentage (2018-2027)				
Elet S904(q)(5) for Pre-2018 ODLs (Y/N)		n/a	n/a	No
Pre-2018 ODL Recapture Pct (50-100)		n/a	n/a	0
REGULAR FTC:				
Summary				
Total Regular FTC from Categories	@ 1120, Sch J: 5a (portion)	195,952,418	478,051,150	282,098,732
Adjustment to Regular FTC	@ 1120, Sch J: 5a (portion)	0	0	0
Less: Boycott Reduction	@ 1118, Sch B, Part III: 5	0	0	0
Total Regular FTC Allowed	@ 1120, Sch J: 5a	195,952,418	478,051,150	282,098,732
Limitation Fraction:				
Increase/Decrease US Taxable Income		0	0	0
Increase/Decrease Income Tax for FTC		0	0	0
Rounding of Limit Fraction (0=No)				
1-14 Decimal Places		9	9	0
Increase Denominator for Post-2017 S904(b)(4)		n/a	n/a	0
Foreign Taxes Deducted				
Adjustment to Proforma Taxable Inc		0	0	0
Adjustment to Proforma Income Tax		0	0	0
S904(b) Capital Gain Net Income (CGNI)				
Foreign CGNI		0	0	0
Less: Worldwide CGNI		0	0	0
Excess Foreign CGNI		0	0	0
Pre-2018 AMT FTC:				
Summary				
Total Pre-2018 AMT FTC from Categories	@ 4626 11 (portion)	90,580,827	372,679,559	282,098,732
Adjustment to AMT FTC	@ 4626 11 (portion)	0	0	0
Less: Boycott Reduction	@ 1118 (AMT), Sch B, Part III: 5	0	0	0
Total Pre-2018 AMT FTC Allowed	@ 4626 11	90,580,827	372,679,559	282,098,732
Limitation Fraction:				
Adjustment to US AMTI		0	0	0
Adjustment to TMT for AMT FTC		0	0	0
Rounding of Limit Fraction (0=No)				
1-14 Decimal Places		9	9	0
Adjust Pre-2005 Overall AMT FTC Limit		0	0	0
Foreign Taxes Deducted				
Adjustment to Proforma AMTI		0	0	0
Adjustment to Proforma Overall Limit		0	0	0
S904(b) Capital Gain Net Income (CGNI):				
Worldwide				
Worldwide CGNI		0	0	0
Increase/Decrease for AMTI		0	0	0
Worldwide CGNI for AMTI		0	0	0
Excess Foreign				
Foreign CGNI for AMTI		0	0	0
Less: Worldwide CGNI for AMTI		0	0	0
Excess Foreign CGNI for AMTI		0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC Current Input - Category 1: General Limitation Income

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====			
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	
REGULAR FTC:				
Current Foreign Income/Loss:				
Income/Loss Before Gross-Up	@ 1118, Sch A: Cols 13-2(b)-3(b)-11	193,669,959	8,868,297,932	8,674,627,973
Dividend Gross-Up (S78)	@ 1118, Sch A: Cols 2(b)-3(b)	9,072,806	291,171,538	282,098,732
Total Income/Loss	@ 1118, Sch A: Cols 13+11	202,742,765	9,159,469,470	8,956,726,705
Capital Gains/Losses in Total		0	0	0
Current Foreign Taxes:				
Taxes Paid/Accrued	@ 1118, Sch B, Part II: 1a+1b-3+4	81,252,109	81,252,109	0
Taxes Deemed Paid	@ 1118, Sch B, Part II: 2	9,072,806	291,171,538	282,098,732
Total Current Taxes	@ 1118, Sch B, Part II: 1a+1b+2-3+4	90,324,915	372,423,647	282,098,732
Overall Foreign Loss (OFL) Account:				
OFL Account Reduction	@ 1118, Sch J, Part III: 3	0	0	0
OFL Additional Recapture		0	0	0
Overall Domestic Loss (ODL) Account:				
ODL Account Reduction	@ 1118, Sch J, Part IV: 3	0	0	0
Pre-2018 Portion of ODL Account Reduction		0	0	0
FTC Category				
Increase Numerator (Post-2017)		n/a	n/a	0
Increase/Decrease Limitation		0	0	0
Increase/Decrease FTC Allowed		0	0	0
Pre-2018 AMT FTC:				
Current Foreign AMTI:				
AMTI Before Gross-Up	@ 1118 (AMT), Sch A: Cols 13-2(b)-3(b)-11	193,669,959	8,868,297,932	8,674,627,973
Dividend Gross-Up (S78)	@ 1118 (AMT), Sch A: Cols 2(b)-3(b)	9,072,806	291,171,538	282,098,732
Total Foreign AMTI	@ 1118 (AMT), Sch A: Cols 13+11	202,742,765	9,159,469,470	8,956,726,705
Current Foreign Taxes:				
Taxes Paid/Accrued	@ 1118 (AMT), Sch B, Part II: 1a+1b-3+4	81,252,109	81,252,109	0
Taxes Deemed Paid	@ 1118 (AMT), Sch B, Part II: 2	9,072,806	291,171,538	282,098,732
Total Current Taxes	@ 1118 (AMT), Sch B, Part II: 1a+1b+2-3+4	90,324,915	372,423,647	282,098,732

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-WITH 965 COMPARED TO WITH 965)
EIN [REDACTED]

Category 1 Income/Loss Before Gross-Up - Custom Input

Year Ending:	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff. 6-5
From e-File	0	0	0
Income/Loss Before Gross-Up	193,669,959	193,669,959	0
FSI For Subpart F & Sec 78	0	0	0
FTC General Basket Income	0	0	0
Sec 78 GU Adj	0	0	0
965(a) inclusion	0	21,086,452,821	21,086,452,821
965(c) deduction	0	(12,362,189,601)	(12,362,189,601)
Sec 965(a) Inclusion	0	(407,648,525)	(407,648,525)
Sec 965(c) Deduction	0	358,013,278	358,013,278
Total	193,669,959	8,868,297,932	8,674,627,973

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Category 1 AMTI Before Gross-Up - Custom Input

Year Ending:	12-31-2017		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
AMTI Before Gross-Up	193,669,959	193,669,959	0
965(a) inclusion	0	21,086,452,821	21,086,452,821
965(c) deduction	0	(12,362,189,601)	(12,362,189,601)
Sec 965(a) Inclusion	0	(407,648,525)	(407,648,525)
Sec 965(c) Deduction	0	358,013,278	358,013,278
Total	193,669,959	8,868,297,932	8,674,627,973

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)

EIN [REDACTED]

Category 1 Taxes Paid/Accrued - Custom Input

Year Ending	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
From e-File	0	0	0
Taxes Paid/Accrued	153,487.818	153,487.818	0
Plug to be to filed tax return	0	0	0
Brazil WHT	(76,869.698)	(76,869.698)	0
FTC General Basket Creditable Taxes	0	0	0
Section 901 Creditable Taxes	4,633.989	4,633.989	0
Total	81,252.109	81,252.109	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Category 1 Taxes Paid/Accrued - Custom Input

Year Ending	===== 12-31-2017 =====		Diff: 6-5
	5 AllAdj(w/o965)	6 AllAdj(w/965)	
Taxes Paid/Accrued	153,487,818	153,487,818	0
Plug to tie to filed tax return	0	0	0
Brazil WHT (AMT)	(76,869,698)	(76,869,698)	0
Section 901 Creditable Taxes (AMT)	4,633,989	4,633,989	0
Total	81,252,109	81,252,109	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Category 1 Sec 965: Other Tax Deemed Paid - Custom Input

Year Ending:	===== 12-31-2017 =====		
	5 AIAAdj(w/o965)	6 AIAAdj(w/965)	Diff 6-5
Sec 965 Deemed Paid Taxes	0	277,419,720	277,419,720
Sec 965 Deemed Paid Foreign Taxes	0	4,679,012	4,679,012
Total	0	282,098,732	282,098,732

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Category 1 Sec 965: Other Tax Deemed Paid - Custom Input

Year Ending:	12-31-2017		
	5: A1Adj(w/o965)	6: A1Adj(w/965)	Diff: 6-5
Sec 965 Deemed Paid Taxes	0	277,419,720	277,419,720
Sec 965 Deemed Paid Foreign Taxes	0	4,679,012	4,679,012
Total	0	282,098,732	282,098,732

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Tax Deemed Paid Category 1 - Imported From e-File (Tier 1)

IRS Form/Lines. Tax Year Begins in 2017	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Dif: 6-5
REGULAR FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118, Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118, Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118, Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118, Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118, Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118, Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118, Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118, Sch C, Part I: 12	0	0	0
Other Tax Deemed Paid @ 1118, Sch C, Part II: 8(b)-III 8	9,072,806	9,072,806	0
Total Tax Deemed Paid	9,072,806	9,072,806	0
Pre-2018 AMT FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118 (AMT), Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118 (AMT), Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118 (AMT), Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118 (AMT), Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118 (AMT), Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118 (AMT), Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118 (AMT), Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118 (AMT), Sch C, Part I: 10	0	0	0
Other Tax Deemed Paid @ 1118 (AMT), Sch C, Part II: 8(b)-III 8	9,072,806	9,072,806	0
Total Tax Deemed Paid	9,072,806	9,072,806	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO W/TH 965)

EIN [REDACTED]

Tax Deemed Paid Category 1 - Sec 965 (Tier 1)

IRS Form/Lines, Tax Year Begins in 2017	12-31-2017		
	5. AllAdj(w/o965)	6. AllAdj(w/965)	Diff. 6-5
REGULAR FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118, Sch C, Part I, 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118, Sch C, Part I, 5	0	0	0
Taxes Paid/Accrued @ 1118, Sch C, Part I, 6(a)	0	0	0
Deemed from Lower Tier @ 1118, Sch C, Part I, 6(b)	0	0	0
Ending Balance @ 1118, Sch C, Part I, 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places			
Dividends from Post-1986 (FC) @ 1118, Sch C, Part I, 8(a)	0	0	0
Post-1986 Fraction @ 1118, Sch C, Part I, 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118, Sch C, Part I, 12	0	0	0
Other Tax Deemed Paid @ 1118, Sch C, Part II, 8(b)-III 8	0	282,098,732	282,098,732
Total Tax Deemed Paid	0	282,098,732	282,098,732
Pre-2018 AMT FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118 (AMT), Sch C, Part I, 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118 (AMT), Sch C, Part I, 5	0	0	0
Taxes Paid/Accrued @ 1118 (AMT), Sch C, Part I, 6(a)	0	0	0
Deemed from Lower Tier @ 1118 (AMT), Sch C, Part I, 6(b)	0	0	0
Ending Balance @ 1118 (AMT), Sch C, Part I, 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places			
Dividends from Post-1986 (FC) @ 1118 (AMT), Sch C, Part I, 8(a)	0	0	0
Post-1986 Fraction @ 1118 (AMT), Sch C, Part I, 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118 (AMT), Sch C, Part I, 10	0	0	0
Other Tax Deemed Paid @ 1118 (AMT), Sch C, Part II, 8(b)-III 8	0	282,098,732	282,098,732
Total Tax Deemed Paid	0	282,098,732	282,098,732

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC Current Input - Category 2: Passive Income

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====			
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	
REGULAR FTC:				
Current Foreign Income/Loss:				
Income/Loss Before Gross-Up	@ 1118, Sch A, Cols 13-2(b)-3(b)+11	106,068,557	106,068,557	0
Dividend Gross-Up (S78)	@ 1118, Sch A, Cols 2(b)-3(b)	255,912	255,912	0
Total Income/Loss	@ 1118, Sch A, Cols 13+11	106,324,469	106,324,469	0
Capital Gains/Losses in Total		0	0	0
Current Foreign Taxes:				
Taxes Paid/Accrued	@ 1118, Sch B, Part II 1a-1b-3+4	0	0	0
Taxes Deemed Paid	@ 1118, Sch B, Part II: 2	255,912	255,912	0
Total Current Taxes	@ 1118, Sch B, Part II: 1a-1b+2-3+4	255,912	255,912	0
Overall Foreign Loss (OFL) Account:				
OFL Account Reduction	@ 1118, Sch J, Part III: 3	0	0	0
OFL Additional Recapture		0	0	0
Overall Domestic Loss (ODL) Account:				
ODL Account Reduction	@ 1118, Sch J, Part IV 3	0	0	0
Pre-2018 Portion of ODL Account Reduction		0	0	0
FTC Category				
Increase Numerator (Post-2017)		n/a	n/a	0
Increase/Decrease Limitation		0	0	0
Increase/Decrease FTC Allowed		0	0	0
Pre-2018 AMT FTC:				
Current Foreign AMTI:				
AMTI Before Gross-Up	@ 1118 (AMT), Sch A, Cols 13-2(b)-3(b)+11	106,068,557	106,068,557	0
Dividend Gross-Up (S78)	@ 1118 (AMT) Sch A, Cols 2(b)-3(b)	255,912	255,912	0
Total Foreign AMTI	@ 1118 (AMT), Sch A, Cols 13+11	106,324,469	106,324,469	0
Current Foreign Taxes				
Taxes Deemed Paid	@ 1118 (AMT), Sch B, Part II: 2	255,912	255,912	0
Total Current Taxes	@ 1118 (AMT) Sch B, Part II 1a-1b+2-3+4	255,912	255,912	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/965 COMPARED TO WITH 965)
EN [REDACTED]

Tax Deemed Paid Category 2 - Imported From e-File (Tier 1)

IRS Form/Lines: Tax Year Begins in 2017	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
REGULAR FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118, Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118, Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118, Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118, Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118, Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118, Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118, Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118, Sch C, Part I: 12	0	0	0
Other Tax Deemed Paid @ 1118, Sch C, Part II: 8(b)-III: 8	255,912	255,912	0
Total Tax Deemed Paid	255,912	255,912	0
Pre-2018 AMT FTC:			
Post-1986 Undistributed Earnings (FC) @ 1118 (AMT), Sch C, Part I: 4	0	0	0
Post-1986 Foreign Taxes:			
Opening Balance @ 1118 (AMT), Sch C, Part I: 5	0	0	0
Taxes Paid/Accrued @ 1118 (AMT), Sch C, Part I: 6(a)	0	0	0
Deemed from Lower Tier @ 1118 (AMT), Sch C, Part I: 6(b)	0	0	0
Ending Balance @ 1118 (AMT), Sch C, Part I: 7	0	0	0
Post-1986 Fraction:			
Round Fraction (0=No):			
1-14 Decimal Places	0	0	0
Dividends from Post-1986 (FC) @ 1118 (AMT), Sch C, Part I: 8(a)	0	0	0
Post-1986 Fraction @ 1118 (AMT), Sch C, Part I: 9	0	0	0
Foreign Tax Deemed Paid:			
Post-1986 Tax Deemed Paid @ 1118 (AMT), Sch C, Part I: 10	0	0	0
Other Tax Deemed Paid @ 1118 (AMT), Sch C, Part II: 8(b)-III: 8	255,912	255,912	0
Total Tax Deemed Paid	255,912	255,912	0

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Federal Total Tax

Year Ending:	12-31-2017		
	5 AIAAdj(w/o965)	6 AIAAdj(w/965)	Diff 6-5
TAXABLE INCOME:			
Taxable Income	27,352,304,244	36,309,030,949	8,956,726,705
FEDERAL INCOME TAX:			
Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
Alternative Capital Gains Tax	n/a	n/a	0
Income Tax Before Adjustment	9,573,306,485	12,708,160,832	3,134,854,347
Adjustment to Fed Inc Tax	0	0	0
Federal Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
FEDERAL TOTAL TAX:			
Federal Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
Pre-2018 Alternative Minimum Tax	0	0	0
Post-2022 Alternative Minimum Tax	n/a	n/a	0
Base Erosion Minimum Tax Amount	n/a	n/a	0
Federal Income Tax Plus Minimum Tax	9,573,306,485	12,708,160,832	3,134,854,347
Less: Foreign Tax Credit	195,952,418	478,051,150	282,098,732
Other Subpart B Credits	0	0	0
General Business Credit	565,680,537	565,680,537	0
Min Tax Credit/Bond Credits	54,883,684	54,883,684	0
Plus: Other Taxes & Interest	0	0	0
Federal Total Tax	8,756,789,846	11,609,545,461	2,852,755,615

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Pre-2018 Alternative Minimum Tax

Year Ending:	12-31-2017		
	5 AAdj(w/o965)	6 AAdj(w/965)	Diff: 6-5
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	No	No
PRE-2018 TENTATIVE MINIMUM TAX:			
Pre-2018 Alternative Minimum Taxable Income	27,232,785.321	36,189,512.026	8,956,726.705
Short Period Annualization	1	1	0
Pre-2018 AMTI - Annualized	27,232,785.321	36,189,512.026	8,956,726.705
Less: Exemption	0	0	0
Excess Pre-2018 AMTI	27,232,785.321	36,189,512.026	8,956,726.705
Pre-Credit TMT Before Fraction	5,446,557.064	7,237,902.405	1,791,345.341
Pre-2018 Fraction	n/a	n/a	0
Pre-Credit TMT	5,446,557.064	7,237,902.405	1,791,345.341
Pre-2005 Overall AMT FTC Limit	5,446,557.064	7,237,902.405	1,791,345.341
Pre-2018 AMT FTC	90,580.827	372,679.559	282,098.732
Pre-2018 TMT - Annualized	5,355,976.237	6,865,222.846	1,509,246.609
Short Period Un-Annualization	1	1	0
Pre-2018 Tentative Minimum Tax	5,355,976.237	6,865,222.846	1,509,246.609
REGULAR TAX:			
Federal Income Tax	9,573,306.485	12,708,160.832	3,134,854.347
Less: FTC/Possessions Credit	195,952.418	478,051.150	282,098.732
Regular Tax After FTC	9,377,354.067	12,230,109.682	2,852,755.615
PRE-2018 ALTERNATIVE MINIMUM TAX:			
Pre-2018 AMT Before Adjustment	0	0	0
Adjustment to Pre-2018 AMT	0	0	0
Pre-2018 Alternative Minimum Tax	0	0	0

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Pre-2018 Alternative Minimum Taxable Income

Year Ending:	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff 6-5
SMALL CORPORATION:			
Qualifies for AMT Repeal After 1997	No	No	No
PREADJUSTMENT PRE-2018 AMTI:			
Regular Taxable Income Before S199	27,352,304,244	36,309,030,949	8,956,726,705
Add: Regular NOL Deduction	35,555,565	35,555,565	0
Taxable Income Before Regular NOLD	27,387,859,809	36,344,586,514	8,956,726,705
Add: Adjustments/Preference Items Before S199	(119,518,893)	(119,518,893)	0
Preadjustment Pre-2018 AMTI	27,268,340,916	36,225,067,621	8,956,726,705
ADJUSTMENTS:			
Pre-2018 ACE Adjustment	0	0	0
Pre-2018 AMTI Before AMT NOLD	27,268,340,916	36,225,067,621	8,956,726,705
PRE-2018 AMT NET OPERATING LOSS:			
S382 Pre-2018 AMT NOL COs Allowed	0	0	0
Non-S382 Pre-2018 AMT NOL Carryovers	35,555,595	35,555,595	0
Pre-2018 AMT NOL Carrybacks	0	0	0
Pre-2018 AMT NOLD Limitation	35,555,595	35,555,595	0
Pre-2018 AMT NOL Deduction	35,555,595	35,555,595	0
PRE-2018 ALTERNATIVE MINIMUM TAXABLE INCOME:			
Pre-2018 AMTI Before Section 199 Deduction	27,232,785,321	36,189,512,026	8,956,726,705
Less: S199 Deduction for Pre-2018 AMTI	0	0	0
Pre-2018 AMTI Before Other	27,232,785,321	36,189,512,026	8,956,726,705
Add: Other Pre-2018 AMTI	0	0	0
Pre-2018 Alternative Minimum Taxable Income	27,232,785,321	36,189,512,026	8,956,726,705

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
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Summary of FTC Allowed

Year Ending	12-31-2017		
	5 AllAdj(w/o965)	6 AllAdj(w/965)	Diff 6-5
FTC ALLOWED:			
Cat 1 General Limitation Income	195,696,506	477,795,238	282,098,732
Cat 2 Passive Income	255,912	255,912	0
Total FTC Before Boycott	195,952,418	478,051,150	282,098,732
Add: Adjustment	0	0	0
Less: Boycott Reduction	0	0	0
Total FTC Allowed	195,952,418	478,051,150	282,098,732
DIVIDEND GROSS-UP FROM CATEGORIES (S78):			
Cat 1 General Limitation Income	9,072,806	291,171,538	282,098,732
Cat 2 Passive Income	255,912	255,912	0
Total Gross-up from Categories	9,328,718	291,427,450	282,098,732

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FTC Allowed - Category 1: General Limitation Income

Year Ending for FTC Category 1	12-31-2017		
	5 ABAdj/w/965;	6 ABAdj/w/965;	Diff: 6-5
FTC AVAILABLE:			
Current FTC	90,324,915	372,423,647	282,098,732
FTC Carryover	0	0	0
FTC Carryback	105,371,591	105,371,591	0
Total FTC Available	195,696,506	477,795,238	282,098,732
FTC FRACTION:			
Numerator:			
Numerator Before Increase	5,236,302,029	14,193,028,734	8,956,726,705
Increase	n/a	n/a	0
Numerator of Fraction	5,236,302,029	14,193,028,734	8,956,726,705
Denominator:			
Taxable Income	27,352,304,244	36,309,030,949	8,956,726,705
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	36,309,030,949	8,956,726,705
Limitation Fraction	.191439156	.390895278	.199456122
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
Add: Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less: Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	12,708,160,832	3,134,854,347
FTC LIMITATION:			
Section 904 Limitation	1,832,705,714	4,967,560,061	3,134,854,347
Limitation Adjustment	0	0	0
FTC Limitation	1,832,705,714	4,967,560,061	3,134,854,347
FTC ALLOWED:			
FTC Allowed Before Adjustment	195,696,506	477,795,238	282,098,732
Adjustment to FTC Allowed	0	0	0
FTC Allowed	195,696,506	477,795,238	282,098,732
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	1,637,009,208	4,489,764,823	2,852,755,615

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FTC Allowed - Category 2 Passive Income

Year Ending for FTC Category 2	===== 12-31-2017 =====		Diff: 6-5
	5 ABAAdj(w/0965)	6 ABAAdj(w/965)	
FTC AVAILABLE:			
Current FTC	255,912	255,912	0
FTC Carryover	0	0	0
FTC Carryback	0	0	0
Total FTC Available	255,912	255,912	0
FTC FRACTION:			
Numerator:			
Numerator Before Increase	136,576,151	136,576,151	0
Increase	n/a	n/a	0
Numerator of Fraction	136,576,151	136,576,151	0
Denominator:			
Taxable Income	27,352,304,244	36,309,030,949	8,956,726,705
Adjustments	0	0	0
Denominator of Fraction	27,352,304,244	36,309,030,949	8,956,726,705
Limitation Fraction	.004993223	.003761493	-.00123173
NET TAX LIABILITY:			
Federal Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
Add: Inc Tax Adjustment	0	0	0
Tax on FTC Deducted	0	0	0
Less: Possessions Credit	0	0	0
Net Tax Liability	9,573,306,485	12,708,160,832	3,134,854,347
FTC LIMITATION:			
Section 904 Limitation	47,801,654	47,801,658	4
Limitation Adjustment	0	0	0
FTC Limitation	47,801,654	47,801,658	4
FTC ALLOWED:			
FTC Allowed Before Adjustment	255,912	255,912	0
Adjustment to FTC Allowed	0	0	0
FTC Allowed	255,912	255,912	0
EXCESS FTC:			
Excess FTC Available	0	0	0
Excess FTC Not Available	0	0	0
EXCESS LIMITATION:			
Excess Limitation	47,545,742	47,545,746	4

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----- FTC Absorbed - Category 1: General Limitation Income -----

	[12-31-2005]		[12-31-2006]		[12-31-2007]		[12-31-2008]				
Year Ending for FTC Category 1:	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)
CURRENT:											
Current Foreign Tax Credit	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	0
	[12-31-2008]		[12-31-2009]		[12-31-2010]		[12-31-2011]				
Year Ending for FTC Category 1:	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	
CURRENT:											
Current Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0	0	
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	
	[12-31-2011]		[12-31-2012]		[12-31-2013]		[12-31-2014]				
Year Ending for FTC Category 1:	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	
CURRENT:											
Current Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0	0	
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0	0	
	[12-31-2015]		[12-31-2016]		12-31-2017						
Year Ending for FTC Category 1:	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5		
CURRENT:											
Current Foreign Tax Credit	0	0	0	0	0	0	90,324,915	372,423,647	282,098,732		
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	90,324,915	372,423,647	282,098,732		
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0		
Unused Foreign Tax Credit	0	0	0	0	0	0	0	0	0		

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FTC Absorbed - Category 2: Passive Income

Year Ending for FTC Category 2:	[12-31-2005]			[12-31-2006]			[12-31-2007]			[12-31-2008]	
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 2:	[12-31-2008]			[12-31-2009]			[12-31-2010]			[12-31-2011]	
	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 2:	[12-31-2011]			[12-31-2012]			[12-31-2013]			[12-31-2014]	
	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	0	0	0	0	0
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0
Year Ending for FTC Category 2:	[12-31-2015]			[12-31-2016]			12-31-2017				
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5		
CURRENT:											
Current Foreign Tax Credit Absorbed in Current Year	0	0	0	0	0	0	255,912	255,912	0	0	0
EXPIRED/UNUSED:											
Expired Unused Foreign Tax Credit	n/a	n/a	n/a	n/a	n/a	n/a	255,912	255,912	0	0	0
	0	0	0	0	0	0	0	0	0	0	0
	0	0	0	0	0	0	0	0	0	0	0

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FTC Numerator - Category 1 General Limitation Income

Year Ending for FTC Category 1:	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Dif: 6-5
Foreign Income or Loss	202,742,765	9,159,469,470	8,956,726,705
Less Foreign NOL Carryover Utilized	0	0	0
Subtotal A	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	202,742,765	9,159,469,470	8,956,726,705
Subtotal B	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	5,033,559,264	5,033,559,264	0
Numerator Before Carryback	5,236,302,029	14,193,028,734	8,956,726,705
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	0
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	5,236,302,029	14,193,028,734	8,956,726,705
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

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FTC Numerator - Category 2: Passive Income

Year Ending for FTC Category 2:	12-31-2017		
	5: AJAdj(w/o965)	6: AJAdj(w/965)	Dif: 6-5
Foreign Income or Loss	106,324,469	106,324,469	0
Less: Foreign NOL Carryover Utilized	0	0	0
Subtotal A	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b)1 - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)1	106,324,469	106,324,469	0
Subtotal B	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	30,251,682	30,251,682	0
Numerator Before Carryback	136,576,151	136,576,151	0
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	0
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	136,576,151	136,576,151	0
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

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FTC: Denominator

Year Ending:	12-31-2017		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
Taxable Income/NOL Generated	27,352,304,244	36,309,030,949	8,956,726,705
Add: NOL Deduction	35,555,565	35,555,565	0
US Income Increase/Decrease	0	0	0
Adjust for FTC Deducted	0	0	0
Less: Foreign Income/Loss	309,067,234	9,265,793,939	8,956,726,705
US Inc/Loss Before US NOL	27,078,792,575	27,078,792,575	0
Less: US NOL COs Utilized	35,555,565	35,555,565	0
US Source Income/Loss	27,043,237,010	27,043,237,010	0
US Source Income/Loss After S904(b)	27,043,237,010	27,043,237,010	0
US Subtotal A	27,043,237,010	27,043,237,010	0
US Subtotal B	27,043,237,010	27,043,237,010	0
Recapture ODLs:			
Cat 1 General Limitation Income	(5,033,559,264)	(5,033,559,264)	0
Cat 2 Passive Income	(30,251,682)	(30,251,682)	0
US Subtotal C	21,979,426,064	21,979,426,064	0
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
US Income/Loss	21,979,426,064	21,979,426,064	0
Sum of Numerators	5,372,878,180	14,329,604,885	8,956,726,705
Denominator of Limitation Fraction:			
Denominator Before Increase	27,352,304,244	36,309,030,949	8,956,726,705
Increase Due to S904(b) 4:	0	0	0
Denominator After Increase	27,352,304,244	36,309,030,949	8,956,726,705

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC Schedule J, Part I - 12-31-2017

FTC Categories for Year Ending 12-2017:	Cat 1			Cat 2		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
Foreign Income or Loss	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
Less: Foreign NOL Carryover Utilized	0	0	0	0	0	0
Subtotal A	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0	0
Subtotal A After S904(b)	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
Subtotal B	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a	n/a	n/a	n/a
Allocate OFLs	0	0	0	0	0	0
Allocate ODLs	0	0	0	0	0	0
Subtotal C	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a	n/a	n/a	n/a
Recapture OFLs	0	0	0	0	0	0
Subtotal D	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a	n/a	n/a	n/a
Subtotal E	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a	n/a	n/a	n/a
Recapture ODLs	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Numerator Before Carryback	5,236,302,029	14,193,028,734	8,956,726,705	136,576,151	136,576,151	0
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	0	n/a	n/a	0
Increase/Decrease Due To						
NOL Carryback From:						
1st Following Year	0	0	0	0	0	0
2nd Following Year	0	0	0	0	0	0
Numerator of Limit Fraction	5,236,302,029	14,193,028,734	8,956,726,705	136,576,151	136,576,151	0
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017-12 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC Losses to be Recaptured - Cat 1 General Limitation Income

Year Ending for FTC Category 1:	***** 12-31-2017 *****		
	5: AIAAdj(w/o965)	6: AIAAdj(w/965)	Diff 6-5
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account			
Beginning Balance:			
Balance Before Adjustment	5,033,559,264	5,033,559,264	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	5,033,559,264	5,033,559,264	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	5,033,559,264	5,033,559,264	0
Less: Current Year Recapture	5,033,559,264	5,033,559,264	0
Bonus Recapture 2018-2027	n/a	n/a	n/a
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	5,033,559,264	5,033,559,264	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	5,033,559,264	5,033,559,264	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	5,033,559,264	5,033,559,264	0
Less: Pre-2018 Current Year Recapture	5,033,559,264	5,033,559,264	0
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017/12 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC: Losses to be Recaptured - Cat 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff 6-5
Overall Foreign Loss (OFL) Account:			
OFL Beginning Balance			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
OFL Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
OFL Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	30,251,682	30,251,682	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	30,251,682	30,251,682	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	30,251,682	30,251,682	0
Less: Current Year Recapture	30,251,682	30,251,682	0
Bonus Recapture 2018-2027	n/a	n/a	n/a
ODL Ending Balance	0	0	0
Pre-2018 Portion of ODL Account:			
Pre-2018 Beginning Balance:			
Pre-2018 Balance Before Adjustment	30,251,682	30,251,682	0
Pre-2018 Adjustment to Beginning Balance	0	0	0
Pre-2018 Beginning Balance	30,251,682	30,251,682	0
Pre-2018 Current Year Additions	0	0	0
Pre-2018 Current Year Reductions	0	0	0
Pre-2018 ODL Subtotal	30,251,682	30,251,682	0
Less: Pre-2018 Current Year Recapture	30,251,682	30,251,682	0
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

FTC: Schedule J, Parts II-IV - 12-31-2017

FTC Categories for Year Ending 12-2017:	----- Cat 1 -----			----- Cat 2 -----		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff 6-5
Overall Foreign Loss (OFL) Account:						
OFL Beginning Balance:						
Balance Before Adjustment	0	0	0	0	0	0
Adjustment to Beginning Balance	0	0	0	0	0	0
Beginning Balance	0	0	0	0	0	0
Current Year Additions	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0
OFL Subtotal	0	0	0	0	0	0
Less: Current Year Recapture	0	0	0	0	0	0
OFL Ending Balance	0	0	0	0	0	0
Overall Domestic Loss (ODL) Account:						
Beginning Balance:						
Balance Before Adjustment	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Adjustment to Beginning Balance	0	0	0	0	0	0
Beginning Balance	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Current Year Additions	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0
ODL Subtotal	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Less: Current Year Recapture	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Bonus Recapture 2018-2027	n/a	n/a	n/a	n/a	n/a	n/a
ODL Ending Balance	0	0	0	0	0	0
Pre-2018 Portion of ODL Account:						
Pre-2018 Beginning Balance:						
Pre-2018 Balance Before Adjustment	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Pre-2018 Adjustment to Beginning Balance	0	0	0	0	0	0
Pre-2018 Beginning Balance	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Pre-2018 Current Year Additions	0	0	0	0	0	0
Pre-2018 Current Year Reductions	0	0	0	0	0	0
Pre-2018 ODL Subtotal	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Less: Pre-2018 Current Year Recapture	5,033,559,264	5,033,559,264	0	30,251,682	30,251,682	0
Pre-2018 Bonus Recapture 2018-2027	n/a	n/a	n/a	n/a	n/a	n/a
Pre-2018 ODL Ending Balance	0	0	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
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Summary of Pre-2018 AMT FTC Allowed

Year Ending:	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
AMT FTC ALLOWED:			
Cat 1: General Limitation Income	90,324,915	372,423,647	282,098,732
Cat 2: Passive Income	255,912	255,912	0
Total AMT FTC Before Adjustments	90,580,827	372,679,559	282,098,732
Add: Adjustment	0	0	0
Less: Boycott Reduction	0	0	0
Total AMT FTC Allowed	90,580,827	372,679,559	282,098,732
AMT FTC GROSS-UP FROM CATEGORIES (S78):			
Cat 1: General Limitation Income	9,072,806	291,171,538	282,098,732
Cat 2: Passive Income	255,912	255,912	0
Total AMT FTC Gross-up	9,328,718	291,427,450	282,098,732
Less: Total Regular FTC Gross-up	9,328,718	291,427,450	282,098,732

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN ██████████

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Pre-2018 AMT FTC Allowed - Category 1 General Limitation Income

Year Ending for FTC Category 1	===== 12-31-2017 =====		
	5: ABAdj(w/o965)	6: ABAdj(w/965)	Diff: 6-5
AMT FTC AVAILABLE:			
Current AMT FTC	90,324,915	372,423,647	282,098,732
AMT FTC Carryover	0	0	0
AMT FTC Carryback	0	0	0
Total AMT FTC Available	90,324,915	372,423,647	282,098,732
AMT FTC FRACTION:			
Numerator of Fraction	4,472,459,912	13,429,186,617	8,956,726,705
Alt Min Taxable Income	27,232,785,321	36,189,512,026	8,956,726,705
Adjustments	0	0	0
Denominator of Fraction	27,232,785,321	36,189,512,026	8,956,726,705
Limitation Fraction	.164230719	.371079516	.206848797
NET PRE-CREDIT TMT:			
Pre-Credit TMT	5,446,557,064	7,237,902,405	1,791,345,341
Add: TMT Adjustment	0	0	0
TMT on FTC Deducted	n/a	n/a	0
Net Pre-Credit TMT	5,446,557,064	7,237,902,405	1,791,345,341
AMT FTC LIMITATION:			
Section 904 Limitation	894,491,983	2,685,837,321	1,791,345,338
Limitation Adjustment	0	0	0
AMT FTC Limitation	894,491,983	2,685,837,321	1,791,345,338
AMT FTC ALLOWED BEFORE ADJUSTMENT:			
AMT FTC Before Overall Limitation	90,324,915	372,423,647	282,098,732
Less: Beyond Overall Limitation	0	0	0
AMT FTC Allowed Before Adjust	90,324,915	372,423,647	282,098,732
TOTAL AMT FTC ALLOWED:			
AMT FTC Allowed Before Adjust	90,324,915	372,423,647	282,098,732
Adjustment to AMT FTC Allowed	0	0	0
Total AMT FTC Allowed	90,324,915	372,423,647	282,098,732
EXCESS AMT FTC/LIMITATION:			
Excess AMT FTC Available	0	0	0
Excess AMT FTC Limitation	804,167,068	2,313,413,674	1,509,246,606

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
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Pre-2018 AMT FTC Allowed - Category 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		Diff: 6-5
	5: AllAdj(w/o965)	6: AllAdj(w/965)	
AMT FTC AVAILABLE:			
Current AMT FTC	255,912	255,912	0
AMT FTC Carryover	0	0	0
AMT FTC Carryback	0	0	0
Total AMT FTC Available	255,912	255,912	0
AMT FTC FRACTION:			
Numerator of Fraction	132,055,734	132,055,734	0
All Min Taxable Income	27,232,785,321	36,189,512,026	8,956,726,705
Adjustments	0	0	0
Denominator of Fraction	27,232,785,321	36,189,512,026	8,956,726,705
Limitation Fraction	.004849145	.003649006	-.001200139
NET PRE-CREDIT TMT:			
Pre-Credit TMT	5,446,557,064	7,237,902,405	1,791,345,341
Add: TMT Adjustment	0	0	0
TMT on FTC Deducted	n/a	n/a	0
Net Pre-Credit TMT	5,446,557,064	7,237,902,405	1,791,345,341
AMT FTC LIMITATION:			
Section 904 Limitation	26,411,145	26,411,149	4
Limitation Adjustment	0	0	0
AMT FTC Limitation	26,411,145	26,411,149	4
AMT FTC ALLOWED BEFORE ADJUSTMENT:			
AMT FTC Before Overall Limitation	255,912	255,912	0
Less: Beyond Overall Limitation	0	0	0
AMT FTC Allowed Before Adjust	255,912	255,912	0
TOTAL AMT FTC ALLOWED:			
AMT FTC Allowed Before Adjust	255,912	255,912	0
Adjustment to AMT FTC Allowed	0	0	0
Total AMT FTC Allowed	255,912	255,912	0
EXCESS AMT FTC LIMITATION:			
Excess AMT FTC Available	0	0	0
Excess AMT FTC Limitation	26,155,233	26,155,237	4

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Pre-2018 AMT FTC Absorbed - Category 1: General Limitation Income

	[12-31-2005]			[12-31-2006]			[12-31-2007]			[12-31-2008]		
Year Ending for FTC Category 1:	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)
CURRENT:												
Current AMT FTC	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:												
Expired	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0	0

	[12-31-2008]			[12-31-2009]			[12-31-2010]			[12-31-2011]			[12-31-2012]		
Year Ending for FTC Category 1:	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)
CURRENT:															
Current AMT FTC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:															
Expired	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

	[12-31-2012]			[12-31-2013]			[12-31-2014]			[12-31-2015]		
Year Ending for FTC Category 1:	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)
CURRENT:												
Current AMT FTC	0	0	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:												
Expired	0	0	0	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0	0

	[12-31-2016]			12-31-2017		
Year Ending for FTC Category 1:	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)
CURRENT:						
Current AMT FTC	0	0	0	90,324,915	372,423,647	282,098,732
Absorbed in Current Year	n/a	n/a	n/a	90,324,915	372,423,647	282,098,732
EXPIRED/UNUSED:						
Expired	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Pre-2018 AMT FTC Absorbed - Category 2 Passive Income

	[12-31-2005]		[12-31-2006]		[12-31-2007]		[12-31-2008]				
Year Ending for FTC Category 2:	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)
CURRENT:											
Current AMT FTC	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired	n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0
	[12-31-2008]		[12-31-2009]		[12-31-2010]		[12-31-2011]		[12-31-2012]		
Year Ending for FTC Category 2:	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)
CURRENT:											
Current AMT FTC	0	0	0	0	0	0	0	0	0	0	0
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0	0	0
Unused AMT FTC	0	0	0	0	0	0	0	0	0	0	0
	[12-31-2012]		[12-31-2013]		[12-31-2014]		[12-31-2015]				
Year Ending for FTC Category 2:	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5		
CURRENT:											
Current AMT FTC	0	0	0	0	0	0	0	0	0		
Absorbed in Current Year	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a		
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0	0	0	0		
Unused AMT FTC	0	0	0	0	0	0	0	0	0		
	[12-31-2016]		[12-31-2017]								
Year Ending for FTC Category 2:	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5	AIAdj(w/o965)	AIAdj(w/965)	Diff: 6-5					
CURRENT:											
Current AMT FTC	0	0	0	255,912	255,912	0					
Absorbed in Current Year	n/a	n/a	n/a	255,912	255,912	0					
EXPIRED/UNUSED:											
Expired	0	0	0	0	0	0					
Unused AMT FTC	0	0	0	0	0	0					

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN: [REDACTED]

Pre-2018 AMT FTC: Numerator - Category 1: General Limitation Income

Year Ending for FTC Category 1	***** 12-31-2017 *****		
	5: ABAAdj(w/o965)	6: ABAAdj(w/965)	Diff: 6-5
Foreign AMTI	202,742,765	9,159,469,470	8,956,726,705
Less: Foreign AMT NOL CO Abs	0	0	0
Subtotal A	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGMI	0	0	0
Subtotal A After S904(b)	202,742,765	9,159,469,470	8,956,726,705
Subtotal B	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	202,742,765	9,159,469,470	8,956,726,705
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	4,269,717,147	4,269,717,147	0
Numerator Before Carryback	4,472,459,912	13,429,186,617	8,956,726,705
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	4,472,459,912	13,429,186,617	8,956,726,705
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN: [REDACTED]

Pre-2018 AMT FTC: Numerator - Category 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	5: AJAd(w/o965)	6: AJAd(w/965)	Diff: 6-5
Foreign AMTI	106,324,469	106,324,469	0
Less Foreign AMT NOL CO Abs	0	0	0
Subtotal A	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0
Subtotal A After S904(b)	106,324,469	106,324,469	0
Subtotal B	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a
Allocate OFLs	0	0	0
Allocate ODLs	0	0	0
Subtotal C	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a
Recapture OFLs	0	0	0
Subtotal D	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a
Subtotal E	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a
Recapture ODLs	25,731,265	25,731,265	0
Numerator Before Carryback	132,055,734	132,055,734	0
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	n/a
Increase/Decrease Due To			
NOL Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
Numerator of Limit Fraction	132,055,734	132,055,734	0
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
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Pre-2018 AMT FTC Denominator

Year Ending:	***** 12-31-2017 *****		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
AMTI/AMT NOL Generated	27,232,785.321	36,189,512,026	8,956,726,705
Add: AMT NOL Deduction	35,555,595	35,555,595	0
US AMTI Adjustment	0	0	0
Adjust for FTC Deducted	0	0	0
Less: Foreign Income/Loss	309,067,234	9,265,793,939	8,956,726,705
US Inc/Loss Before US NOL	26,959,273,682	26,959,273,682	0
Less: US AMT NOL COs Absorbed	35,555,595	35,555,595	0
US Source AMTI	26,923,718,087	26,923,718,087	0
US Source Income/Loss After S904(b)	26,923,718,087	26,923,718,087	0
US Subtotal A	26,923,718,087	26,923,718,087	0
US Subtotal B	26,923,718,087	26,923,718,087	0
Recapture ODLs:			
Cat 1 General Limitation Income	(4,269,717,147)	(4,269,717,147)	0
Cat 2 Passive Income	(25,731,265)	(25,731,265)	0
US Subtotal C	22,628,269,675	22,628,269,675	0
Increase/Decrease Due To			
NOT Carryback From:			
1st Following Year	0	0	0
2nd Following Year	0	0	0
US AMTI	22,628,269,675	22,628,269,675	0
Sum of Numerators	4,604,515,646	13,561,242,351	8,956,726,705
Denominator of Fraction	27,232,785,321	36,189,512,026	8,956,726,705

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Pre-2018 AMT FTC: Schedule J, Part I - 12-31-2017

FTC Categories for Year Ending 12-2017:	==== Cat 1 =====			==== Cat 2 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
Foreign AMTI	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
Less: Foreign AMT NOL CO Abs	0	0	0	0	0	0
Subtotal A	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in A	n/a	n/a	n/a	n/a	n/a	n/a
S904(b) - Allocate Excess Foreign CGNI	0	0	0	0	0	0
Subtotal A After S904(b)	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
Subtotal B	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in B	n/a	n/a	n/a	n/a	n/a	n/a
Allocate OFLs	0	0	0	0	0	0
Allocate ODLs	0	0	0	0	0	0
Subtotal C	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in C	n/a	n/a	n/a	n/a	n/a	n/a
Recapture OFLs	0	0	0	0	0	0
Subtotal D	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in D	n/a	n/a	n/a	n/a	n/a	n/a
Subtotal E	202,742,765	9,159,469,470	8,956,726,705	106,324,469	106,324,469	0
AJCA 2004 S965 NCDs in E	n/a	n/a	n/a	n/a	n/a	n/a
Recapture ODLs	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0
Numerator Before Carryback	4,472,459,912	13,429,186,617	8,956,726,705	132,055,734	132,055,734	0
AJCA 2004 S965 NCDs in Num Before CB	n/a	n/a	n/a	n/a	n/a	n/a
Increase/Decrease Due To						
NOL Carryback From:						
1st Following Year	0	0	0	0	0	0
2nd Following Year	0	0	0	0	0	0
Numerator of Limit Fraction	4,472,459,912	13,429,186,617	8,956,726,705	132,055,734	132,055,734	0
AJCA 2004 S965 NCDs in Numerator	n/a	n/a	n/a	n/a	n/a	n/a

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

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Pre-2018 AMT FTC: Losses to be Recaptured - Cat 1: General Limitation Income

Year Ending for FTC Category 1:	===== 12-31-2017 =====		
	5: AIAdj(w/o965)	6: AIAdj(w/965)	Diff: 6-5
Overall Foreign Loss (OFL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
Subtotal	0	0	0
Less Current Year Recapture	0	0	0
Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	4,269,717,147	4,269,717,147	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	4,269,717,147	4,269,717,147	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	4,269,717,147	4,269,717,147	0
Less Current Year Recapture	4,269,717,147	4,269,717,147	0
ODL Ending Balance	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Pre-2018 AMT FTC: Losses to be Recaptured - Cat 2: Passive Income

Year Ending for FTC Category 2:	===== 12-31-2017 =====		
	5: AIAdj(w/o965)	6: AIAdj(w/965)	Diff: 6-5
Overall Foreign Loss (OFL) Account:			
Beginning Balance:			
Balance Before Adjustment	0	0	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	0	0	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
Subtotal	0	0	0
Less: Current Year Recapture	0	0	0
Ending Balance	0	0	0
Overall Domestic Loss (ODL) Account:			
Beginning Balance:			
Balance Before Adjustment	25,731,265	25,731,265	0
Adjustment to Beginning Balance	0	0	0
Beginning Balance	25,731,265	25,731,265	0
Current Year Additions	0	0	0
Current Year Reductions	0	0	0
ODL Subtotal	25,731,265	25,731,265	0
Less: Current Year Recapture	25,731,265	25,731,265	0
ODL Ending Balance	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Pre-2018 AMT FTC: Schedule J, Parts II-IV - 12-31-2017

		===== Cat 1 =====			===== Cat 2 =====		
FTC Categories for Year Ending 12-2017:		5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
Overall Foreign Loss (OFL) Account:							
Beginning Balance:							
Balance Before Adjustment		0	0	0	0	0	0
Adjustment to Beginning Balance		0	0	0	0	0	0
Beginning Balance		0	0	0	0	0	0
Current Year Additions		0	0	0	0	0	0
Current Year Reductions		0	0	0	0	0	0
Subtotal		0	0	0	0	0	0
Less: Current Year Recapture		0	0	0	0	0	0
Ending Balance		0	0	0	0	0	0
Overall Domestic Loss (ODL) Account:							
Beginning Balance:							
Balance Before Adjustment	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0	0
Adjustment to Beginning Balance	0	0	0	0	0	0	0
Beginning Balance	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0	0
Current Year Additions	0	0	0	0	0	0	0
Current Year Reductions	0	0	0	0	0	0	0
ODL Subtotal	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0	0
Less: Current Year Recapture	4,269,717,147	4,269,717,147	0	25,731,265	25,731,265	0	0
ODL Ending Balance	0	0	0	0	0	0	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-WID 965 COMPARED TO WITH 965)
EIN [REDACTED]

General Business Credit - Summary

Year Ending:	***** 12-31-2017 *****		
	5: AllAdj(w/965)	6: AllAdj(w/965)	Diff 6-5
STANDARD GBC GENERATED THIS YEAR:			
Current Standard GBC	317,271,060	317,271,060	0
Less: Allowed This Year	317,271,060	317,271,060	0
Available for CO/CB	0	0	0
ABSORBED BY CO/CB TO CURRENT YEARS:			
Carryovers and Carrybacks <From>/To:			
From [12-2014]	54,440	54,440	0
From [12-2015]	25,757,999	25,757,999	0
From [12-2016]	222,249,404	222,249,404	0
STANDARD GBC ALLOWED THIS YEAR:			
Standard GBC Limitation	4,021,377,830	5,364,886,836	1,343,509,006
Standard GBC Allowed This Year			
Refundable Standard GBC	n/a	n/a	0
Nonrefundable Standard GBC			
From This Year	317,271,060	317,271,060	0
From Other Years	248,061,843	248,061,843	0
Total Nonfundable	565,332,903	565,332,903	0
TOTAL GBC ALLOWED THIS YEAR:			
Nonrefundable Standard GBC Allowed	565,332,903	565,332,903	0
Zone Credits Allowed	0	0	0
Specified Credits Allowed	347,634	347,634	0
Eligible Small Business Credits Allowed	0	0	0
Total GBC Before Adjustment	565,680,537	565,680,537	0
Adjustment to Total GBC	0	0	0
Total Nonrefundable GBC Allowed	565,680,537	565,680,537	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 201712 (SECTION 965-W/D 965 COMPARED TO WITH 965)
EIN: [REDACTED]

General Business Credit Allowed

Year Ending:	===== 12-31-2017 =====		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff 6-5
STANDARD GBC AVAILABLE:			
Current Standard GBC	317,271,060	317,271,060	0
Standard GBC Carryover	248,061,843	248,061,843	0
Standard GBC Carryback	0	0	0
Total Standard GBC Available	565,332,903	565,332,903	0
STANDARD GBC LIMITATION:			
Net Income Tax:			
Federal Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
Pre-2018 Alternative Minimum Tax	0	0	0
Post-2022 Alternative Minimum Tax	n/a	n/a	0
Less: Subpart B Credits	195,952,418	478,051,150	282,098,732
Net Income Tax	9,377,354,067	12,230,109,682	2,852,755,615
Net Regular Tax:			
Federal Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
Less: Subpart B Credits	195,952,418	478,051,150	282,098,732
Net Regular Tax	9,377,354,067	12,230,109,682	2,852,755,615
Standard GBC Limitation:			
Net Income Tax	9,377,354,067	12,230,109,682	2,852,755,615
Less: Greater of -			
Pre-2018 Tentative Minimum Tax	5,355,976,237	6,865,222,846	1,509,246,609
25% x (Net Regular Tax - \$25,000)	2,344,332,267	3,057,521,171	713,188,904
25% x (Net Income Tax - \$25,000)	n/a	n/a	0
Normal GBC Limit	4,021,377,830	5,364,886,836	1,343,509,006
Add: Former Section 38(c)(2)	0	0	0
GBC Limit Before S168(k)(4)	4,021,377,830	5,364,886,836	1,343,509,006
Add: S168(k)(4) Additional GBC Limitation:			
Election I (2008-09)	n/a	n/a	0
Election II (2009-10)	n/a	n/a	0
Standard GBC Limitation	4,021,377,830	5,364,886,836	1,343,509,006
TOTAL STANDARD GBC ALLOWED:			
Standard GBC Allowed	565,332,903	565,332,903	0
Less: Nonrefundable Standard GBC Allowed	565,332,903	565,332,903	0
Refundable Standard GBC Allowed	n/a	n/a	0
TOTAL GENERAL BUSINESS CREDIT ALLOWED:			
Nonrefundable Standard GBC Allowed	565,332,903	565,332,903	0
Zone Credits Allowed	0	0	0
Specified Credits Allowed	347,634	347,634	0
Eligible Small Business Credits Allowed	0	0	0
Total GBC Before Adjustment	565,680,537	565,680,537	0
Adjustment to Total GBC	0	0	0
Total General Business Credit Allowed	565,680,537	565,680,537	0

META PLATFORMS INC FKA FACEBOOK INC & SUBSIDIARIES
TAX YEARS 2017/12 (SECTION 965-W/O 965 COMPARED TO WITH 965)
EIN [REDACTED]

Minimum Tax Credit Allowed

Year Ending	12-31-2017		
	5: AllAdj(w/o965)	6: AllAdj(w/965)	Diff: 6-5
ELECT FULL REFUND FOR 2018:			
Elect Full Refund for 2018 (Y/N) (S53(e)(5))	n/a	n/a	No
MTC GENERATED THIS YEAR:			
Net Minimum Tax	0	0	0
Plus Credits Disallowed:			
Orphan Drug (Pre-1995)	0	0	0
Nonconventional Fuel (Pre-2006)	0	0	0
Qualified Electric Vehicle (Pre-2007)	0	0	0
MTC Generated This Year	0	0	0
MTC LIMITATION FOR THIS YEAR:			
Regular Income Tax	9,573,306,485	12,708,160,832	3,134,854,347
BEAT	0	0	0
Regular Income Tax Plus BEAT	0	0	0
Less: Non-Bond Credits	761,632,955	1,043,731,687	282,098,732
Regular Tax After Credits	8,811,673,530	11,664,429,145	2,852,755,615
Regular Tax Plus BEAT After Credits	0	0	0
Less: Pre-2018 Tentative Minimum Tax	5,355,976,237	6,865,222,846	1,509,246,609
Less: Post-2022 Tentative Minimum Tax	0	0	0
MTC Limitation Before S55(e)/Restrictions	3,455,697,293	4,799,206,299	1,343,509,006
Net Change Due to S55(e)/Restrictions	0	0	0
MTC Limitation After S55(e)/Restrictions	3,455,697,293	4,799,206,299	1,343,509,006
Increase/Decrease MTC Limit	0	0	0
Preliminary MTC Limitation (Pre-2018)	3,455,697,293	4,799,206,299	1,343,509,006
Preliminary MTC Limitation (Post-2023)	0	0	0
MTC Limitation After S168(k)(4):			
Preliminary MTC Limitation (Pre-2018)	3,455,697,293	4,799,206,299	1,343,509,006
MTC Limitation After S168(k)(4)	3,455,697,293	4,799,206,299	1,343,509,006
MTC ALLOWED THIS YEAR:			
MTC from Previous Year	54,883,684	54,883,684	0
MTC Limitation	3,455,697,293	4,799,206,299	1,343,509,006
Total MTC Allowed	54,883,684	54,883,684	0
Less: Nonrefundable MTC Allowed	54,883,684	54,883,684	0
Refundable MTC Allowed This Year	n/a	n/a	0
MTC AVAILABLE FOR NEXT YEAR:			
MTC to Next Year Before Adjustment	0	0	0
Increase/Decrease MTC to Next Year	0	0	0
MTC Available for Next Year	0	0	0

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Unagreed Adjustments

CBA-301 Brazil WHT

For the taxable years 2017, 2018, and 2019, the foreign tax credit under IRC 901 on your return is decreased by \$76,869,698, \$68,298,785, and \$91,243,485, respectively. Your income tax is increased accordingly. This adjustment relates to a portion (the “Withholding Tax”) of the Brazilian withholding taxes associated with the Ads Dissemination Services Agreement between Facebook Miami, Inc. and Facebook Servicos Online Do Brasil LTDA. Under IRC 7701(o) and judicial doctrines (substance over form doctrine, conduit entity doctrine and the step transaction doctrine), the transactions resulting in the Withholding Tax should not be respected; the tax benefits (i.e., foreign tax credits) arising therefrom are disallowed. Furthermore, and for the same reasons, Facebook Miami, Inc. may not claim a deduction under IRC 164 for the Withholding Tax for the taxable years 2017, 2018 and 2019.

If the transactions resulting in the Withholding Tax are respected under IRC 7701(o), the substance over form doctrine, the conduit entity doctrine and the step transaction doctrine, then the foreign tax credit under IRC 901 on your return for the taxable years 2017, 2018, and 2019 is still decreased pursuant to IRC 901(l) by \$76,869,698, \$68,298,785, and \$91,243,485, respectively. Your income tax is increased accordingly. In this circumstance, Facebook Miami, Inc. would be permitted a deduction under IRC 164 for the Withholding Tax for the taxable years 2017, 2018 and 2019, but an increase to your income is required under IRC 482 for the taxable years 2017, 2018 and 2019 in the amount of the permitted deduction under IRC 164.

CBA-301 Brazil WHT (AMT)

AMT adjustments are made for the regular income tax adjustments to your foreign tax credit related to Brazilian withholding taxes, as explained in CBA-301.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

CBA-304 Sec 965 Aggregate Foreign Cash Position Increase

Your IRC 965 aggregate foreign cash position is increased by \$203,193,939 for the taxable year 2017.

TPP-01 Stock Based Compensation Costs Relating to Cost Sharing

Salaries and wages reported on Form 1120, Line 13, are decreased due to an adjustment under IRC 482 and the regulations thereunder for certain stock-based compensation not included in the pool of allocable intangible development costs (“IDCs”) for a cost sharing arrangement (“CSA”). Alternatively, such stock-based compensation expense is disallowed as a deduction under IRC 162 and the regulations thereunder because such expenses were not ordinary and necessary for the taxpayer’s trade or business. Instead, they were incurred for the benefit of another taxpayer, in this case, a foreign subsidiary. As a result, your income has been increased by \$1,545,871,426 and \$1,692,082,457 for the taxable years 2017 and 2018, respectively.

In an affirmative claim, you sought to decrease the pool of allocable IDCs for a CSA by the amount of salaries and wages for stock-based compensation for the taxable year 2019. Your affirmative claim is not allowed for the same reasons supporting the adjustments in TPP-01.

TPP-02 Periodic Adjustments

You engaged in a platform contribution transaction (PCT) under Treas. Reg. § 1.482-7(b)(1)(ii) upon entering into a CSA effective September 15, 2010 (the “2010 PCT”), as well as subsequent PCTs during the duration of the CSA Activity, with Facebook Ireland Holdings Unlimited (formerly known as Facebook Ireland Holdings Limited), a commonly owned or controlled entity within the meaning of IRC 482.

Pursuant to IRC 482 and the regulations thereunder, the income you reported from the 2010 PCT and subsequent PCTs during the duration of the CSA Activity is not commensurate with the income attributable to the transferred intangible property and that, as a result, a Periodic Trigger occurred under Treas. Reg. § 1.482-7(i)(6)(v). Therefore, you are subject to periodic adjustments for the taxable years 2017, 2018,

Meta Platforms, Inc. and Subsidiaries

Notice of Deficiency

**Taxable Years 2017, 2018, and 2019
Explanation of Adjustments**

and 2019. As a result, your income has been increased by \$20,690,603,113, \$15,116,977,863, and \$18,584,405,532 for the taxable years 2017, 2018 and 2019, respectively.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Partially Agreed Adjustments

CBA-302 FDII (F8993)

Your IRC 250 foreign-derived intangible income is decreased by \$457,824,835 and \$1,437,682,332 for the taxable years 2018 and 2019, respectively. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 4 and 9. Your request number 4.b. is not allowed.

CBA-305 Sec 965(a) Inclusion Decrease

Your IRC 965(a) earnings is decreased by \$407,648,525 for the taxable year 2017. The amount includes certain foreign tax redeterminations, corrections, and other adjustments disclosed on the Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 1.b., 1.c., and 1.e., and alternative notifications of foreign tax redeterminations. Your requests with respect to foreign tax redeterminations for Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) are not allowed.

CBA-307 Sec 965 Deemed Paid Taxes (Increase)

Your deemed paid taxes for your IRC 965 inclusion is increased by \$4,679,012 for the taxable year 2017. The amount includes certain foreign tax redeterminations, corrections, and other adjustments disclosed on the Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 1.a. and 1.d., and alternative notifications of foreign tax redeterminations. Your requests with respect to foreign tax redeterminations for Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) are not allowed.

CBA-316 GILTI Inclusion

Your IRC 951A GILTI income is decreased by \$66,114,493 and \$20,404,062 for the taxable years 2018 and 2019, respectively. The amount includes certain foreign tax redeterminations, corrections, and other adjustments disclosed on the Statement

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 3 and 8, and alternative notifications of foreign tax redeterminations. Your requests with respect to foreign tax redeterminations for Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) are not allowed.

CBA-321 951A GILTI Deemed Paid Taxes

Your deemed paid taxes for your IRC 951A GILTI income is increased by \$2,538,933 for the taxable year 2018 and decreased by \$13,523,400 for the taxable year 2019. The amount includes certain foreign tax redeterminations, corrections, and other adjustments disclosed on the Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 5.b. and 10.b., and alternative notifications of foreign tax redeterminations. Your requests with respect to foreign tax redeterminations for Spain, Italy, Hong Kong, Turkey, and Ireland (AQ) are not allowed.

ENG-01 Research Credit

As determined in the closing agreement between you and the Commissioner entered into on June 24, 2025, your allowed IRC 41 qualified research expenses reported on the consolidated tax return of Facebook, Inc. and Subsidiaries are \$3,671,077,149, \$3,977,733,898, and \$5,092,122,665 for the taxable years 2017, 2018, and 2019, respectively.

IRC 41(f)(1) requires a controlled group of corporations to aggregate qualified research expenditures to determine the amount of research credit allowable to each member. IRC 41(f)(5) defines controlled group of corporations. The allowed qualified research expense amounts do not include the qualified research expenses of other corporations in taxpayer's IRC 41(f)(5) controlled group of corporations. After application of the IRC 41(f)(1) controlled group of corporations rules, your IRC 41 research credit is decreased by \$26,271,361, \$238,526,523, and \$201,069,883 for the taxable years 2017, 2018, and 2019, respectively.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Adjustments to Income

CBA-312 Subpart F Inclusion

Your Subpart F inclusion is decreased by \$65,289 and \$395,168 for the taxable years 2018 and 2019, respectively. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 3 and 8.

CBA-322 Dual Consolidated Losses

Based on adjustments to dual consolidated losses, your income is increased by \$3,051,177 and \$44,921 for the taxable years 2018 and 2019, respectively. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 6 and 12.

DOM-101 Meals & Entertainment Expenses

You are allowed an additional deduction of \$34,693,110 and \$47,108,166 for meals and entertainment expenses for the taxable years 2018 and 2019, respectively. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 7 and 13.

DOM-103 PFIC 2019 Gain

Under IRC 1291, your income is increased by \$114,887 for the taxable year 2019 arising from the disposition of Wave Accounting, Inc. stock. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 11.b.

DOM-108 PFIC Ordinary Income

Your income is increased by \$919,726 for the taxable year 2019 arising from the disposition of Wave Accounting, Inc. stock. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 11.a.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Adjustments That Affect Income, Taxes, and Credits

CBA-314 Subpart F – Deemed Paid Foreign Taxes

Your IRC 960 deemed paid foreign taxes for subpart F income is decreased by \$21,371 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 10.b.

CBA-314 Subpart F – Deemed Paid Foreign Taxes

Your IRC 960 deemed paid foreign taxes for subpart F income is increased by \$83,070 for the taxable year 2018. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 5.b.

CBA-315 FSI Subpart F & Sec 78

Your foreign source income for subpart F income and IRC 78 gross-up is increased by \$17,780 for the taxable year 2018.

CBA-317 GILTI Sec 78 Gross-Up

Your IRC 78 gross-up for your IRC 951A GILTI income is increased by \$3,173,667 for the taxable year 2018 and decreased by \$16,904,250 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 3 and 8.

CBA-318 FSI 951A GILTI

Your foreign source income for your IRC 951A GILTI income is decreased by \$66,114,493 and \$20,404,062 for the taxable years 2018 and 2019, respectively.

CBA-319 FSI 951A GILTI Sec 78 Gross-Up

Your foreign source income for your IRC 78 gross-up from your IRC 951A GILTI income is increased by \$3,173,667 for the taxable year 2018 and decreased by \$16,904,250 for the taxable year 2019.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

CBA-320 FSI 951A GILTI Sec 250 Deduction

Your foreign source income for your IRC 250 deduction from your IRC 951A GILTI income is increased by \$31,470,413 and \$18,654,156 for the taxable years 2018 and 2019, respectively.

CBA-323 Section 901 Creditable Taxes (AMT)

Your IRC 901 creditable taxes (AMT) is increased by \$4,633,989 for the taxable year 2017.

CBA-323 Section 901 Creditable Taxes

Your IRC 901 creditable taxes is increased by \$4,633,989 for the taxable year 2017. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.a.

CBA-324 2017 FTC ODL-General

Your 2017 beginning balance overall domestic loss account (general) is increased by \$384,408,635 for the taxable year 2017. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.b.

CBA-324 2017 FTC ODL-General-Pre-2018

Your 2017 beginning balance overall domestic loss account (general pre-2018) is increased by \$384,408,635 for the taxable year 2017. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.b.

CBA-325 2017 FTC ODL-Passive-Pre-2018

Your 2017 beginning balance overall domestic loss account (passive pre-2018) is decreased by \$555,855 for the taxable year 2017. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.b.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

CBA-325 2017 FTC ODL-Passive

Your 2017 beginning balance overall domestic loss account (passive) is decreased by \$555,855 for the taxable year 2017. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.b.

CBA-326 2018 Foreign Branch – C/B To 2017 General

Your general basket foreign tax credits are increased by \$42,879,800. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.c. and 2.d.

CBA-326 2018 Foreign Branch – C/B To 2017 General

Your foreign branch basket foreign tax credits are reduced by \$42,879,800. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 2.c. and 2.d.

CBA-327 FTC Foreign Branch Income

Your foreign tax credit branch basket income is decreased by \$309,008,372 and \$198,881,542 for the taxable years 2018 and 2019, respectively.

CBA-328 FTC Foreign Branch Creditable Taxes

Your foreign tax credit foreign branch creditable taxes is decreased by \$24,778 for the taxable year 2018 and increased by \$5,879,520 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 5.e., 10.c., and 10.d.

CBA-329 FTC Passive Basket Creditable Taxes

Your foreign tax credit passive basket creditable taxes is decreased by \$6,203,584 for the taxable year 2018. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 5.d.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

CBA-330 FTC Passive Income Moved To General Income

Your foreign source income passive basket is decreased by \$241,074,403 for the taxable year 2018. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 5.c.

CBA-331 FTC General Basket Creditable Taxes

Your foreign tax credit general basket creditable taxes is increased by \$17,529,860 for the taxable year 2018. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 5.d.

CBA-331 FTC General Basket Creditable Taxes

Your foreign tax credit general basket creditable taxes is increased by \$416,539 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 10.b.

CBA-333 FTC General Basket Income

Your foreign tax credit general basket income is decreased by \$18,777,720 and \$4,472,959 for the taxable years 2018 and 2019, respectively.

CBA-339 FTC Treaty Income

Your foreign tax credit treaty basket income is decreased by \$17,804,527 for the taxable year 2019.

CBA-341 FTC Treaty creditable Tax

Your foreign tax credit treaty creditable tax is decreased by \$1,013,808 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 10.d.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

DOM-102 2015 NOL Carryover to 2017

Your net operating loss carryover is decreased by \$2,066,668 for the taxable year 2017.

DOM-104 Tax on Disposition of PFIC Stock

Under IRC 1291, your tax is increased on the disposition of Wave Accounting, Inc. stock in a Section 1291 fund by \$265,609 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 11.b.

DOM-105 Interest on Disposition of PFIC Stock

Under IRC 1291, the interest on the tax is increased on the disposition of Wave Accounting, Inc. stock in a Section 1291 fund by \$58,225 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 11.b.

DOM-106 2015 ATNOL Carryover To 2017

Your alternative tax net operating (ATNOL) carryover is decreased by \$2,066,668 for the taxable year 2017.

DOM-107 PFIC Capital Gain

Your capital gain is decreased by \$919,726 for the taxable year 2019 from the disposition of Wave Accounting, Inc. stock. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Item 11.a.

Meta Platforms, Inc. and Subsidiaries

Notice of Deficiency

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Memo Adjustments

CBA-303 FDII (F8993)

Your IRC 250 FDII deduction is decreased by \$171,684,313 and \$539,130,874 for the taxable years 2018 and 2019, respectively. See CBA-302.

CBA-306 Sec 965(c) Deduction Decrease

Your IRC 965(c) deduction is decreased by \$358,013,278 for the taxable year 2017.

CBA-308 Sec 965 - Sec 78 Gross-Up Increase

Your IRC 78 gross-up for your IRC 965 deemed paid taxes for the taxable year 2017 is increased by \$4,679,012. See CBA-307.

CBA-309 FSI (Gnl. Basket) Sec 965 Inclusion Decrease

Your foreign source income (general basket) for your net IRC 965 inclusion is decreased by \$49,635,247 for the taxable year 2017.

CBA-310 FSI (Gnl. Basket) Sec 965-Sec 78 Gross-Up (Increase)

Your foreign source income (general basket) for your IRC 78 gross-up from your net IRC 965 inclusion is increased by \$4,679,012 for the taxable year 2017.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Penalties

Accuracy – Nondisclosed Noneconomic Substance Transaction

As your return had a nondisclosed noneconomic substance transaction (*see* CBA-301, Brazil WHT), a penalty under IRC 6662(i) applies to the underpayment arising from the adjustment attributable to that transaction for the taxable years 2017 and 2018. The penalty applies to the portion of any underpayment attributable to a transaction described in IRC 6662(b)(6) where the relevant facts affecting the tax treatment are not adequately disclosed in the return or in a statement attached to the return. The penalty is 40 percent of the underpayment attributable to the transaction. In addition, interest is imposed on the penalty if not paid within 21 calendar days (10 business days if the amount for which notice and demand is made equals or exceeds \$100,000) from the date of notice and demand for the penalty's payment to the date of payment. See IRC 6662(b)(6), (i) and the attached computation.

If it is determined that you provided adequate disclosure of a noneconomic substance transaction, the portion of the underpayment attributable to the transaction lacking economic substance under IRC 7701(o) is subject to a penalty equal to 20 percent of the underpayment under IRC 6662(b)(6). In addition, interest is imposed on the penalty if not paid within 21 calendar days (10 business days if the amount for which notice and demand is made equals or exceeds \$100,000) from the date of notice and demand for the payment to the date of payment. See the attached computation.

Alternatively, a penalty under IRC 6662(b)(2) applies to the underpayment arising from the adjustment described in CBA-301 for the taxable years 2017 and 2018.

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Computational Adjustments (Including Applicable Agreed and Unagreed Adjustments)

CALC04 Net Operating Loss Deduction

Due to the adjustments in this notice that affect your net operating loss deduction, it is decreased by \$2,066,668 for the taxable year 2017. See DOM-102.

CALC05 Section 250 Deduction Decrease

Due to the adjustments in this notice that affect your IRC 250 deduction, it is decreased by \$203,154,726 and \$557,785,030 for the taxable years 2018 and 2019, respectively. See CBA-303 and CBA-320.

CALC08 Section 78 Gross-Up

Due to the adjustments in this notice that affect your IRC 78 gross-up for GILTI and Subpart F, it is increased by \$3,256,737 for the taxable year 2018 and is decreased by \$16,509,082 for the taxable year 2019. The amount includes adjustments with respect to Statement Furnished Under Rev. Proc. 94-69 and Request for Refund of Overpayment, Items 3 and 8. See CBA-312 and CBA-317.

CALC25 GILTI Income

Due to the adjustments in this notice that affect your IRC 951A income, it is decreased by \$66,114,493 and \$20,404,062 for the taxable years 2018 and 2019, respectively. See CBA-316.

Meta Platforms, Inc. and Subsidiaries

Notice of Deficiency

Taxable Years 2017, 2018, and 2019
Explanation of Adjustments

Adjustments to Taxes and Credits

CALC11 Foreign Tax Credit Decrease <Increase>

Due to the adjustments in this notice which affect foreign tax credits, your foreign tax credits are increased by \$33,313,258 for the taxable year 2017 and decreased by \$125,678,182 and \$14,558,579 for the taxable years 2018 and 2019, respectively.

CALC13 General Business Credit Decrease<Increase>

Due to the adjustments in this notice which affect general business credits, your general business credits are decreased by \$26,271,361, \$238,526,523, and \$201,069,883 for the taxable years 2017, 2018 and 2019, respectively.

CALC20 Regular Income Tax

Due to the adjustments in this notice which affect regular income taxes, your regular income taxes are increased by \$7,783,489,422, \$3,552,706,514, and \$4,002,624,869 for the taxable years 2017, 2018 and 2019, respectively.

CALC21 Other Taxes & Interest

Due to the adjustments in this notice which affect other taxes and interest, your other taxes and interest are increased by \$58,225 for the taxable year 2019.

CBA-311 IRC 965 Tax

Your IRC 965 tax is decreased by \$20,413,694 for the taxable year 2017.

Taxpayer: Meta Platforms, Inc. and Subsidiaries, formerly Facebook Inc. and Subsidiaries

Tax years: 201712 - 201912

Issue: Brazilian Withholding Taxes

Subject: Exam's Penalty Calculation Worksheet

	201712	201812	201912
Adjustment to foreign tax credit ("FTC") related to Brazilian withholding taxes	76,869,698	68,298,785	91,243,485
Reduction in FTC utilized	76,869,698	68,298,785	0
Underpayment of tax on which penalty is imposed	76,869,698	68,298,785	N/A
Penalty rate	40%	40%	N/A
IRC § 6662(i) penalty	30,747,879	27,319,514	N/A

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Department of the Treasury
Internal Revenue Service
Small Business / Self-Employed (SBSE)

JON M CONTRERAS
5250 NORTH PALM AVENUE STE 300
FRESNO, CA 93704

Date: SEP 23 2025

Taxpayer ID number (last 4 digits)

Taxpayer name(s):
META PLATFORMS INC.
AKA META PLATFORMS INC & SUBSIDIARIES

Form number:
1120

Years:
201912 201812 201712

Person to contact:
Benny Tang

Employee ID number:
ID # 1000682894

Contact telephone number:
669-229-1505

Contact fax number:
(877) 477-9165

Dear JON M CONTRERAS:

We are sending the enclosed material under the provisions of your power of attorney or other authorization we have on file. For your convenience, we have listed the name of the taxpayer to whom this material relates in the heading above.

If you have any questions, please call the contact person at the telephone number shown in the heading of this letter.

Thank you for your cooperation.

Sincerely yours,

Joshua A. Cook
Technical Services Territory Manager

Enclosures:

- Letters
- Reports
- Copy of Determination Letter
- Other

Case Number: 50227

Sender:

Letter 937 (Rev. 3-2017)
Catalog Number 30760X



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Department of the Treasury
Internal Revenue Service
Small Business / Self-Employed (SBSE)

REBECCA HOWARD
5250 NORTH PALM AVENUE STE 300
FRESNO, CA 93704

Date: SEP 23 2025

Taxpayer ID number (last 4 digits)

Taxpayer name(s):

META PLATFORMS INC.

AKA META PLATFORMS INC & SUBSIDIARIES

Form number:

1120

Years:

201912 201812 201712

Person to contact:

Benny Tang

Employee ID number:

ID # 1000682894

Contact telephone number:

669-229-1505

Contact fax number:

(877) 477-9165

Dear REBECCA HOWARD:

We are sending the enclosed material under the provisions of your power of attorney or other authorization we have on file. For your convenience, we have listed the name of the taxpayer to whom this material relates in the heading above.

If you have any questions, please call the contact person at the telephone number shown in the heading of this letter.

Thank you for your cooperation.

Sincerely yours,

Joshua A. Cook
Technical Services Territory Manager

Enclosures:

- Letters
- Reports
- Copy of Determination Letter
- Other

Case Number: 50227

Sender:

Letter 937 (Rev. 3-2017)
Catalog Number 30760X