Form **8879**

(Rev. January 2021)

Department of the Treasury Internal Revenue Service

IRS e-file Signature Authorization

▶ ERO must obtain and retain completed Form 8879.

► Go to www.irs.gov/Form8879 for the latest information.

OMB No. 1545-0074

Submission Identification Number (SID)	
Taxpayer's name	Social security number
DUSHAYNTH SHANUBHOGANAHALLI NANDEESH	657-54-0650
Spouse's name	Spouse's social security number
Part I Tax Return Information — Tax Year Ending December 31, 202.	3 (Enter year you are authorizing.)
Enter whole dollars only on lines 1 through 5.	
Note: Form 1040-SS filers use line 4 only. Leave lines 1, 2, 3, and 5 blank.	
1 Adjusted gross income	
2 Total tax	2
3 Federal income tax withheld from Form(s) W-2 and Form(s) 1099	3 23
4 Amount you want refunded to you	
5 Amount you owe	5
Part II Taxpayer Declaration and Signature Authorization (Be sure you go	et and keep a copy of your return)
my knowledge and belief, it is true, correct, and complete. I further declare that the amounts in P return (original or amended) I am now authorizing. I consent to allow my intermediate service provide to send my return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reas for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I author Agent to initiate an ACH electronic funds withdrawal (direct debit) entry to the financial institution ac payment of my federal taxes owed on this return and/or a payment of estimated tax, and the financia authorization is to remain in full force and effect until I notify the U.S. Treasury Financial Agent to payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537. Payment cancell business days prior to the payment (settlement) date. I also authorize the financial institutions involvates to receive confidential information necessary to answer inquiries and resolve issues related personal identification number (PIN) below is my signature for the income tax return (original or ame Electronic Funds Withdrawal Consent.	er, transmitter, or electronic return originator (ERG on for rejection of the transmission, (b) the reason for rejection of the transmission, (b) the reason rize the U.S. Treasury and its designated Financi count indicated in the tax preparation software for all institution to debit the entry to this account. The terminate the authorization. To revoke (cancel) ation requests must be received no later than used in the processing of the electronic payment to the payment. I further acknowledge that the
Taxpayer's PIN: check one box only	
	generate my PIN 4 0 6 5 0 as m
ERO firm name	Enter five digits, but don't enter all zeros
signature on the income tax return (original or amended) I am now authorizing.	don't enter all zeros
I will enter my PIN as my signature on the income tax return (original or amended if you are entering your own PIN and your return is filed using the Practitioner F below.	
Your signature ► E	Oate ►
Spouse's PIN: check one box only	
	jenerate my PIN as m
ERO firm name	Enter five digits, but don't enter all zeros
signature on the income tax return (original or amended) I am now authorizing.	
I will enter my PIN as my signature on the income tax return (original or amender if you are entering your own PIN and your return is filed using the Practitioner F below.	
Spouse's signature ►	Oate ▶
Practitioner PIN Method Returns Only—continue	
Part III Certification and Authentication — Practitioner PIN Method Only	
ERO's EFIN/PIN. Enter your six-digit EFIN followed by your five-digit self-selected PIN.	2 2 2 4 9 6 0 8 2 7 1 Don't enter all zeros
I certify that the above numeric entry is my PIN, which is my signature for the electronic individual authorized to file for tax year indicated above for the taxpayer(s) indicated above. I confirm that I requirements of the Practitioner PIN method and Pub. 1345 , Handbook for Authorized IRS e-file Prov	am submitting this return in accordance with the
ERO's signature ►	Date ▶
ERO Must Retain This Form — See Instruct	

Don't Submit This Form to the IRS Unless Requested To Do So

Department of the Treasury—Internal Revenue Service U.S. Nonresident Alien Income Tax Return

2023

IRS Use Only—Do not write or staple in this space.

For the year Jar	n. 1–D	ec. 31, 2023, or other tax year beginn	ing	, 2023,	ending	,	20	See separate instructions.	
Your first name and middle initial Last name			ame	Ye			Your identifying number see instructions)		
DUSHAYNTH SHANUBHOGANAHALLI NANDEESH			657-5	657-54-0650					
Home address (number and street). If you have a P.O. box, see instructions.						Apt. no.			
720 MILLO	REE	K LN							
City, town, or p	ost of	ffice. If you have a foreign address, als	so comp	lete spaces below.		State	Z	IP code	
LEANDER						TX		8641	
Foreign country	nam	e	Foreig	n province/state/county		Foreign p	ostal code)	
Filing Status							Esta	te 🗌 Trust	
Check only one box.	If you checked the QSS box, enter the child's name if the qualifying person is a child but not your dependent:								
Digital Assets	At a othe	ny time during 2023, did you: (a) recei erwise dispose of a digital asset (or a f	ve (as a inancial	reward, award, or paymeinterest in a digital asset	ent for property or se)? (See instructions.)	ervices); or		change, or Yes No	
Dependents				(2) 2		(4) Che	eck the box if	qualifies for (see inst.):	
(see instructions):		(1) First name Last name		(2) Dependent's identifying number	(3) Relationship to yo	Chile	d tax credit	Credit for other dependents	
		(1) That hame		identifying names	(b) Holadonomp to ye	,,,		dependents	
If more than four							\Box		
dependents, see instructions and							\Box		
check here							П		
Income	1a	Total amount from Form(s) W-2, box	: 1 (see i	nstructions)			. 1a	4,620.	
Effectively	b	Household employee wages not rep	•	•				,	
Connected	С								
With U.S.	d								
Trade or	е								
Business	f	Employer-provided adoption benefit					. 1f		
	g Wages from Form 8919, line 6						. 1g		
Attach Form(s) W-2,	h	Other earned income (see instruction	ns) .				. 1h		
1042-S,	i Reserved for future use								
SSA-1042-S,	j	Reserved for future use					. <u>1j</u>		
RRB-1042-S, and 8288-A here. Also	k Total income exempt by a treaty from Schedule OI (Form 1040-NR), item L, line 1(e)								
attach	z	Add lines 1a through 1h	, .				. 1z	4,620.	
Form(s) 1099-R if	2a	Tax-exempt interest 2a	1	b Tax	able interest		. 2b		
tax was	3a	Qualified dividends	1		linary dividends .				
withheld.	4a	IRA distributions 4a			able amount				
If you did not	5a	Pensions and annuities 5a			able amount				
get a Form W-2, see	6	Reserved for future use					_		
instructions.	7	Capital gain or (loss). Attach Schedu	,	, ,	•				
	8	Additional income from Schedule 1 (4 600	
	9	Add lines 1z, 2b, 3b, 4b, 5b, 7, and 8		-				4,620.	
	10	Adjustments to income from Sched income					. 10		
	11	Subtract line 10 from line 9. This is y						4,620.	
	12	Itemized deductions (from Schedu deduction (see instructions)						13,850.	
13a Qualified business income deduction from Form 8995 or Form 8995-A . 13a									
	b Exemptions for estates and trusts only (see instructions)								
	С	Add lines 13a and 13b					. 13c		
	14							13,850.	
	15	Subtract line 14 from line 11. If zero	or less,	enter -0 This is your tax	xable income .		. 15	0.	

Form 1040-NR (2023)						Page 2	
Tax and	16	Tax (see instructions). Check if any from Form(s): 1 8814	2 497	2 3 🗌		16	0.	
Credits	17	Amount from Schedule 2 (Form 1040), line 3				17	0.	
	18	Add lines 16 and 17				18	0.	
	19	Child tax credit or credit for other dependents from Schedule 8	812 (Form 10	40)		19		
	20	Amount from Schedule 3 (Form 1040), line 8				20		
	21	Add lines 19 and 20				21		
	22	Subtract line 21 from line 18. If zero or less, enter -0				22	0.	
	23a	Tax on income not effectively connected with a U.S. trade or bu	siness from					
		Schedule NEC (Form 1040-NR), line 15		23a				
	b	Other taxes, including self-employment tax, from Schedule 2 (F	Form 1040),					
		line 21		23b				
	С	Transportation tax (see instructions)		23c				
	d	Add lines 23a through 23c				23d		
	24	Add lines 22 and 23d. This is your total tax				24	0.	
Payments	25	Federal income tax withheld from:						
	а	Form(s) W-2		25a	23.			
	b	Form(s) 1099		25b				
	С	Other forms (see instructions)		25c				
	d	Add lines 25a through 25c				25d	23.	
	е	Form(s) 8805				25e		
	f	Form(s) 8288-A				25f		
	g	Form(s) 1042-S				25g		
	26	2023 estimated tax payments and amount applied from 2022 re	eturn			26		
	27	Reserved for future use		27				
	28	Additional child tax credit from Schedule 8812 (Form 1040) .		28				
	29	Credit for amount paid with Form 1040-C		29				
	30	Reserved for future use		30				
	31	Amount from Schedule 3 (Form 1040), line 15		31				
	32 Add lines 28, 29, and 31. These are your total other payments and refundable credits							
	33	Add lines 25d, 25e, 25f, 25g, 26, and 32. These are your total p			1	33	23.	
Refund	34 If line 33 is more than line 24, subtract line 24 from line 33. This is the amount you overpaid					34	23.	
	35a Amount of line 34 you want refunded to you . If Form 8888 is attached, check here						23.	
Direct deposit?	b	Routing number 0 2 1 2 0 2 3 3 7	Savings	35a				
See instructions.	d	Account number 3 1 7 5 1 1 3 3 2						
	- -	If you want your refund check mailed to an address outside the	nage 1					
	·	enter it here.	o o mica o late	o not onown on	page 1,			
	36	Amount of line 34 you want applied to your 2024 estimated ta	 NX	36				
Amount	37	Subtract line 33 from line 24. This is the amount you owe .						
You Owe	٠.	For details on how to pay, go to www.irs.gov/Payments or see i	instructions .			37		
100 OWC	38	Estimated tax penalty (see instructions)		38				
Third		u want to allow another person to discuss this return with the IR			es. Comple	ete belo	ow. 🛛 No	
Party	•	·	0. 000		nal identific		<u>_</u>	
Designee	Designee's Phone Personal identific name no. number (PIN)							
	Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and							
		they are true, correct, and complete. Declaration of preparer (other than to						
Sign	gn Your signature Date Your occupation						ent you an Identity	
Here							PIN, enter it here	
		SO	FTWARE E	NGINEER	(see i	nst.)		
	Phone	e no. Email address						
Paid	Prepa	rer's name Preparer's signature		Date	PTIN	\Box	Check if:	
	SYAM	I PRIYA RAM SAGAR GUPTA SYAM PRIYA RAM SAGA	AR GUPTA	04/09/2024	P02082	703	☐ Self-employed	
Preparer	Firm's	sname GLOBAL TAXES LLC			Phone no). (67	8)965-9522	
Use Only	Firm's address 245 ROONEY CT E BRUNSWICK NJ 08816 Firm's EIN 84-3171965							

SCHEDULE NEC (Form 1040-NR)

Tax on Income Not Effectively Connected With a U.S. Trade or Business

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service

13

14

Name shown on Form 1040-NR

DUSHAYNTH SHANUBHOGANAHALLI NANDEESH

Attach to Form 1040-NR. Go to www.irs.gov/Form1040NR for instructions and the latest information. Sequence No. 7B

Your identifying number

657-54-0650

Enter amount of income under the appropriate rate of tax. See instructions. (d) Other (specify) **Nature of Income** (a) 10% **(b)** 15% (c) 30% % % Dividends and dividend equivalents: Dividends paid by U.S. corporations 1a 1b Dividend equivalent payments received with respect to section 871(m) transactions 1c 2 Interest: 2a 2b 2c 3 4 5 Real property income and natural resources royalties 6 7 8 9 10 Gambling-Residents of Canada only. Enter net income in column (c). If zero or less, enter -0-. Winnings ___ Losses 10c Gambling-Residents of countries other than Canada. Note: Enter winnings only. Losses aren't allowed 11 Other (specify): 12

Capital Gains and Losses From Sales or Exchanges of Property 16 Enter only the capital gains and (a) Kind of property and description (f) LOSS (g) GAIN (b) Date acquired (c) Date sold (d) Sales price (e) Cost or losses from property sales or (if necessary, attach statement of If (e) is more than (d), If (d) is more than (e), other basis mm/dd/yyyy mm/dd/yyyy exchanges that are from sources descriptive details not shown below) subtract (d) from (e). subtract (e) from (d). within the United States and not effectively connected with a U.S. business. Do not include a gain or loss on disposing of a U.S. real property interest; report these gains and losses on Schedule D (Form 1040). Report property sales or exchanges that are effectively connected with a U.S. business 17 Add columns (f) and (g) of line 16 on Schedule D (Form 1040). 18 Capital gain. Combine columns (f) and (g) of line 17. Enter the net gain here and on line 9 above. If a loss, enter -0-Form 4797, or both. 18

12

13

Tax on income not effectively connected with a U.S. trade or business. Add columns (a) through (d) of line 14. Enter the total here and on Form 1040-NR, line 23a

Add lines 1a through 12 in columns (a) through (d)

Multiply line 13 by rate of tax at top of each column

SCHEDULE OI (Form 1040-NR)

Other Information

Attach to Form 1040-NR.

Your identifying number

Department of the Treasury Internal Revenue Service

Name shown on Form 1040-NR

Go to www.irs.gov/Form1040NR for instructions and the latest information. Answer all questions.

2023	
Attachment Sequence No. 7C	

OMB No. 1545-0074

A Of what country or countries were you a clitzen or national during the tax year?INJIA_ In what country did you claim residence for tax purposes during the tax year?United_States_ C Have you ever applied to be a green card holder (awful permanent resident) of the United States?	DUSF	SHAYNTH SHANUBHOGANAHALLI NANDEESH				657-54-0650				
Be In what country did you claim residence for tax purposes during the tax year? United States Yes No Have you ever applied to be a green card holder (lawful permanent resident) of the United States? Yes No Were you ever: 1. A U.S. citizen? Yes No Yes No Yes Yes No Yes Yes No Yes Yes No Yes Yes Yes No Yes Yes Yes No If you answer "Yes" to (1) or (2), see Pub. 519, chapter 4, for expatriation rules that apply to you. If you had a visa on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year. If you answered "Yes," indicate the data and nature of the change; Ust all dates you entered and left the United States during 2023. See instructions. Note: If you're a resident of Canada or Mexico and Skip to item H.	Α									
C Have you ever applied to be a green card holder (lawful permanent resident) of the United States?	В	In what country did you claim residence for tax purposes during the tax year? United States								
1. A U.S. citizen?	С	Have you ever applied to be a green card holder (lawful permanent resident) of the United States?								
2. A green card holder (lawful permanent resident) of the United States?	D	Were you ever:								
If you answer "Yes" to (1) or (2), see Pub. 519, chapter 4, for expatriation rules that apply to you.	1.	A U.S. citizen?				🗌 Yes	⊠ No			
If you answer "Yes" to (1) or (2), see Pub. 519, chapter 4, for expatriation rules that apply to you. If you had a visa on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year, "F1" F Have you ever changed your visa type (nonimmigrant status) or U.S. immigration status?	2.	A green card holder (lawful per	manent resident) of the Un	ited States?		🗌 Yes	⊠ No			
E If you had a visa on the last day of the tax year, enter your visa type. If you didn't have a visa, enter your U.S. immigration status on the last day of the tax year.		-	•							
immigration status on the last day of the tax year. F1 Have you ever changed your visa type (nonimmigrant status) or U.S. immigration status?	Е									
Have you ever changed your visa type (nonimmigrant status) or U.S. immigration status?		immigration status on the last of	day of the tax year. $_{\rm F1}$			·				
If you answered "Yes," indicate the date and nature of the change: Ist all dates you entered and left the United States during 2023. See instructions. Note: If you're a resident of Canada or Mexico AMD commute to work in the United States at frequent intervals, check the box for Canada or Mexico and skip to item H	F	Have you ever changed your v	isa type (nonimmigrant stat				⊠ No			
List all dates you entered and left the United States during 2023. See instructions. Note: If you're a resident of Canada or Mexico AnD commute to work in the United States at frequent intervals, check the box for Canada or Mexico and skip to item H										
Note: If you're a resident of Canada or Mexico AND commute to work in the United States at frequent intervals, check the box for Canada or Mexico and skip to Item H	G				ctions.					
Date entered United States mm/dd/yy Date entered United States mm/dd/yy Date departed United States mm/dd/yy Date departed United States mm/dd/yy Date entered United States during:		-				ent intervals,				
H Give number of days (including vacation, nonworkdays, and partial days) you were present in the United States during: 2021		check the box for Canada or	Mexico and skip to item H	1		☐ Mexico				
H Give number of days (including vacation, nonworkdays, and partial days) you were present in the United States during: 2021		Date entered United States	Date departed United State	es	Date entered United States	s Date departed Unite	d States			
2021 ,2022 , and 2023 3.65 I Did you file a U.S. income tax return for any prior year?		mm/dd/yy	mm/dd/yy		mm/dd/yy					
2021 ,2022 , and 2023 3.65 I Did you file a U.S. income tax return for any prior year?										
2021 ,2022 , and 2023 3.65 I Did you file a U.S. income tax return for any prior year?										
2021 ,2022 , and 2023 3.65 I Did you file a U.S. income tax return for any prior year?										
2021 ,2022 , and 2023 3.65 I Did you file a U.S. income tax return for any prior year?										
I Did you file a U.S. income tax return for any prior year?	Н	Give number of days (including	vacation, nonworkdays, and	partial days) you v	vere present in the United S	States during:				
I Did you file a U.S. income tax return for any prior year?		2021	, 2022	, and	1 2023 365					
Are you filing a return for a trust?	ı	Did you file a U.S. income tax	return for any prior year?.			🗌 Yes	⊠ No			
Are you filing a return for a trust?		If "Yes," give the latest year an	d form number you filed:							
U.S. person, or receive a contribution from a U.S. person?	J	Are you filing a return for a trus	st?			Yes	⊠ No			
Did you receive total compensation of \$250,000 or more during the tax year?		If "Yes," did the trust have a U	J.S. or foreign owner unde	r the grantor trust	rules, make a distribution	or loan to a				
If "Yes," did you use an alternative method to determine the source of this compensation?		U.S. person, or receive a contr	ribution from a U.S. person	?		· · · · 🗌 Yes	☐ No			
Income Exempt From Tax—If you are claiming exemption from income tax under a U.S. income tax treaty with a foreign country, complete (1) through (3) below. See Pub. 901 for more information on tax treaties. 1. Enter the name of the country, the applicable tax treaty article, the number of months in prior years you claimed the treaty benefit, and the amount of exempt income in the columns below. Attach Form 8833 if required. See instructions. (a) Country (b) Tax treaty article (c) Number of months claimed in prior tax years income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above? 3. Are you claiming treaty benefits pursuant to a Competent Authority determination? 1. Income tax under a U.S. income tax treaty with a foreign country, complete tax treaty article (C) Number of months claimed in prior years you claimed the treaty benefit, and the amount of exempt income in current tax year (d) Amount of exempt income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above? 3. Are you claiming treaty benefits pursuant to a Competent Authority determination? 3. Yes No If "Yes," attach a copy of the Competent Authority determination letter to your return.	K	Did you receive total compens	ation of \$250,000 or more	during the tax year	?	🗌 Yes	⊠ No			
complete (1) through (3) below. See Pub. 901 for more information on tax treaties. 1. Enter the name of the country, the applicable tax treaty article, the number of months in prior years you claimed the treaty benefit, and the amount of exempt income in the columns below. Attach Form 8833 if required. See instructions. (a) Country (b) Tax treaty article (c) Number of months claimed in prior tax years (d) Amount of exempt income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above? 3. Are you claiming treaty benefits pursuant to a Competent Authority determination? (b) Tax treaty article (c) Number of months (d) Amount of exempt income in current tax year		If "Yes," did you use an alterna	ative method to determine t	he source of this o	compensation?	🗌 Yes	☐ No			
1. Enter the name of the country, the applicable tax treaty article, the number of months in prior years you claimed the treaty benefit, and the amount of exempt income in the columns below. Attach Form 8833 if required. See instructions. (a) Country (b) Tax treaty article (c) Number of months claimed in prior tax years (d) Amount of exempt income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above? 3. Are you claiming treaty benefits pursuant to a Competent Authority determination? 1. Yes No 1.	L	Income Exempt From Tax-If	you are claiming exempti	on from income t	ax under a U.S. income t	tax treaty with a foreign	country,			
amount of exempt income in the columns below. Attach Form 8833 if required. See instructions. (a) Country (b) Tax treaty article claimed in prior tax years (c) Number of months claimed in prior tax years (d) Amount of exempt income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above? 3. Are you claiming treaty benefits pursuant to a Competent Authority determination? (b) Tax treaty article (c) Number of months claimed in prior tax years (d) Amount of exempt income in current tax year		complete (1) through (3) below	. See Pub. 901 for more inf	ormation on tax tr	eaties.					
(e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 Were you subject to tax in a foreign country on any of the income shown in 1(d) above? Were you claiming treaty benefits pursuant to a Competent Authority determination? (b) Tax treaty article (c) Number of months claimed in prior tax years income in current tax year Yes No Yes No I "Yes," attach a copy of the Competent Authority determination letter to your return.	1.	Enter the name of the country,	the applicable tax treaty art	icle, the number of	months in prior years you	claimed the treaty benefit	t, and the			
claimed in prior tax years income in current tax year (e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above?		amount of exempt income in th	e columns below. Attach Fo	orm 8833 if required	d. See instructions.					
(e) Total. Enter this amount on Form 1040-NR, line 1k. Do not enter it anywhere else on line 1 2. Were you subject to tax in a foreign country on any of the income shown in 1(d) above? ☐ Yes ☐ No 3. Are you claiming treaty benefits pursuant to a Competent Authority determination? ☐ Yes ☒ No If "Yes," attach a copy of the Competent Authority determination letter to your return.		(a) Cour	ntry	(b) Tax treaty artic			Amount of exempt			
 Were you subject to tax in a foreign country on any of the income shown in 1(d) above? Are you claiming treaty benefits pursuant to a Competent Authority determination? Yes No If "Yes," attach a copy of the Competent Authority determination letter to your return. 					claimed in prior tax yea	ars income in current t	ax year			
 Were you subject to tax in a foreign country on any of the income shown in 1(d) above? Are you claiming treaty benefits pursuant to a Competent Authority determination? Yes No If "Yes," attach a copy of the Competent Authority determination letter to your return. 										
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3. Are you claiming treaty benefits pursuant to a Competent Authority determination?				-						
If "Yes," attach a copy of the Competent Authority determination letter to your return.										
	3.									
M Chack the applicable box if:										
• • • • • • • • • • • • • • • • • • • •	M	Check the applicable box if:								
	1.	1. This is the first year you are making an election to treat income from real property located in the United States as effectively connected								
with a U.S. trade or business under section 871(d). See instructions		-								
2. You have made an election in a previous year that has not been revoked, to treat income from real property located in the United States as effectively connected with a U.S. trade or business under section 871(d). See instructions	2.									