8879

IRS e-file Signature Authorization

OMB No. 1545-0074

2018

Department of the Treasury Internal Revenue Service ► Return completed Form 8879 to your ERO. (Don't send to the IRS.)

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

Submission Identification Number (SID) Taxpayer's name Social security number DINESH KUMAR MOVVA 866-55-5630 Spouse's name Spouse's social security number Part I Tax Return Information — Tax Year Ending December 31, 2018 (Whole dollars only) Adjusted gross income (Form 1040, line 7; Form 1040NR, line 35) 70,120. 2 8,727. 3 3 Federal income tax withheld from Forms W-2 and 1099 (Form 1040, line 16; Form 1040NR, line 62a). 9,180. Refund (Form 1040. line 20a; Form 1040-SS, Part I, line 13a; Form 1040NR, line 73a) 453. 5 Part II Taxpayer Declaration and Signature Authorization (Be sure you get and keep a copy of your return) Under penalties of perjury, I declare that I have examined a copy of my electronic individual income tax return and accompanying schedules and statements for the tax year ending December 31, 2018, and to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amounts in Part I above are the amounts from my electronic income tax return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send my return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an ACH electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of my federal taxes owed on this return and/or a payment of estimated tax, and the financial institution to debit the entry to this account. This authorization is to remain in full force and effect until I notify the U.S. Treasury Financial Agent to terminate the authorization. To revoke (cancel) a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537. Payment cancellation requests must be received no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I further acknowledge that the personal identification number (PIN) below is my signature for my electronic income tax return and, if applicable, my Electronic Funds Withdrawal Consent. Taxpayer's PIN: check one box only X lauthorize GLOBAL TAXES LLC 5 to enter or generate my PIN **ERO** firm name Enter five digits, but as my signature on my tax year 2018 electronically filed income tax return. don't enter all zeros I will enter my PIN as my signature on my tax year 2018 electronically filed income tax return. Check this box only if you are entering your own PIN and your return is filed using the Practitioner PIN method. The ERO must complete Part III below. Your signature ▶ Spouse's PIN: check one box only I authorize to enter or generate my PIN ERO firm name as my signature on my tax year 2018 electronically filed income tax return. I will enter my PIN as my signature on my tax year 2018 electronically filed income tax return. Check this box only if you are entering your own PIN and your return is filed using the Practitioner PIN method. The ERO must complete Part III below. Spouse's signature ▶ Date ▶ Practitioner PIN Method Returns Only—continue below Certification and Authentication — Practitioner PIN Method Only 5 2 4 5 8 8 1 **ERO's EFIN/PIN.** Enter your six-digit EFIN followed by your five-digit self-selected PIN. Don't enter all zeros I certify that the above numeric entry is my PIN, which is my signature for the tax year 2018 electronically filed income tax return for the taxpaver(s) indicated above. I confirm that I am submitting this return in accordance with the requirements of the Practitioner PIN method and Pub. 1345, Handbook for Authorized IRS e-file Providers of Individual Income Tax Returns. ERO's signature ▶ **ERO Must Retain This Form — See Instructions**

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

Form **1040NR**Department of the Treasury

U.S. Nonresident Alien Income Tax Return

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

For the year January 1–December 31, 2018, or other tax year

OMB No. 1545-0074

Internal Revenue Service beainnina , 2018, and ending Identifying number (see instructions) Your first name and initial Last name 866-55-5630 DINESH KUMAR MOVVA Present home address (number and street or rural route). If you have a P.O. box, see instructions. Apt. no. Check if: Individual Please print 4931 CENTRAL AVE 160 Estate or Trust or type City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below. See instructions. FREMONT CA 94536 Foreign country name Foreign province/state/county Foreign postal code 1 Reserved 4 Reserved **Filing** 2 X Single nonresident alien 5 Married nonresident alien **Status** 3 Reserved Qualifying widow(er) (see instructions) Check only Child's name ▶ one box. Dependents **Dependents:** (see instructions) (2) Dependent's (3) Dependent's (4) ✓ if qualifies for (see instr.): identifying number relationship to you If more Credit for other dependents Child tax credit (1) First name Last name than four dependents, see instructions and check here. 84,719 8 Wages, salaries, tips, etc. Attach Form(s) W-2 8 Income 9a Taxable interest 9a **Effectively** b Tax-exempt interest. Do not include on line 9a 9b Connected 10a Ordinary dividends 10a With U.S. **b** Qualified dividends (see instructions) 10b Trade/ **Business** 11 Taxable refunds, credits, or offsets of state and local income taxes (see instructions) . . . 11 12 Scholarship and fellowship grants. Attach Form(s) 1042-S or required statement (see instructions) 12 13 Business income or (loss). Attach Schedule C or C-EZ (Form 1040) 13 14 Capital gain or (loss). Attach Schedule D (Form 1040) if required. If not required, check here 14 Other gains or (losses). Attach Form 4797 15 Attach Form(s) 16 Reserved . 16 W-2, 1042-S, SSA-1042S, **17b** Taxable amount (see instr.) **17a** IRAs, pensions, and annuities **17a** 17b RRB-1042S. -14,599 18 Rental real estate, royalties, partnerships, trusts, etc. Attach Schedule E (Form 1040) . . . 18 and 8288-A here. Also Farm income or (loss). Attach Schedule F (Form 1040) 19 attach Form(s) 20 20 1099-R if tax was withheld. 21 Other income. List type and amount (see instructions) 21 22 Total income exempt by a treaty from page 5, Schedule OI, Item L (1)(e) 23 Combine the amounts in the far right column for lines 8 through 21. This is your total 23 70,120. Educator expenses (see instructions) 24 24 **Adjusted** Health savings account deduction. Attach Form 8889 . . . Gross Moving expenses for members of the Armed Forces, Attach Income Form 3903 26 27 Deductible part of self-employment tax. Attach Schedule SE 27 **28** Self-employed SEP, SIMPLE, and qualified plans . 28 29 Self-employed health insurance deduction (see instructions) **30** Penalty on early withdrawal of savings 30 Scholarship and fellowship grants excluded 31 **32** IRA deduction (see instructions) 32 33 Student loan interest deduction (see instructions) Add lines 24 through 33 34 Adjusted Gross Income. Subtract line 34 from line 23. 70,120. 35 Amount from line 35 (adjusted gross income) 36 70,120. Tax and Itemized deductions from page 3, Schedule A, line 8 . Std. Dedn US/India Treaty 37 12,000. **Credits** Qualified business income deduction (see instructions). 38 Exemptions for estates and trusts only (see instructions) 39

40 12,000. Tax and 58,120. **41 Taxable income.** Subtract line 40 from line 36. If zero or less, enter -0- . . . 41 Credits **42** Tax (see instr.). Check if any is from Form(s): a \square 8814 b \square 4972 c \square 42 8,727. (continued) Alternative minimum tax (see instructions). Attach Form 6251 43 Excess advance premium tax credit repayment. Attach Form 8962 . 44 Add lines 42, 43, and 44 45 8,727. **46** Foreign tax credit. Attach Form 1116 if required 46 Credit for child and dependent care expenses. Attach Form 2441 48 Retirement savings contributions credit. Attach Form 8880 . 48 49 Child tax credit and credit for other dependents (see 49 **50** Residential energy credit. Attach Form 5695 51 Other credits from Form: a ☐ 3800 b ☐ 8801 c ☐ **52** Add lines 46 through 51. These are your **total credits** . . . 52 53 Subtract line 52 from line 45. If zero or less, enter -0-8,727. Tax on income not effectively connected with a U.S. trade or business from page 4. **Other** 54 Taxes 55 Self-employment tax. Attach Schedule SE (Form 1040) 55 **56** Unreported social security and Medicare tax from Form: **a** 4137 **b** 8919 56 57 Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required 57 58 **59a** Household employment taxes from Schedule H (Form 1040) . . . 59a **b** Repayment of first-time homebuyer credit from Form 5405. Attach Form 5405 if required . 59b **60** Taxes from: **a** ☐ Form 8959 **b** ☐ Instructions; enter code(s) 61 Total tax. Add lines 53 through 60 8,727. **62** Federal income tax withheld from: **Payments** a Form(s) W-2 and 1099 9,180. 62a 62b **c** Form(s) 8288-A 62c **d** Form(s) 1042-S 63 2018 estimated tax payments and amount applied from 2017 return 64 Additional child tax credit. Attach Schedule 8812 65 Net premium tax credit. Attach Form 8962 65 **66** Amount paid with request for extension to file (see instructions) **67** Excess social security and tier 1 RRTA tax withheld (see instructions) **68** Credit for federal tax on fuels. Attach Form 4136 68 **69** Credits from Form: **a** 2439 **b** Reserved **c** 8885 **d** 69 **70** Credit for amount paid with Form 1040-C 71 Add lines 62a through 70. These are your total payments 71 9,180. 72 If line 71 is more than line 61, subtract line 61 from line 71. This is the amount you overpaid 72 453. Refund 73a Amount of line 72 you want refunded to you. If Form 8888 is attached, check here . ▶ □ 453. Direct deposit? **b** Routing number | 3 | 2 | 2 | 2 | 7 | 1 | 6 | 2 | 7 | c Type: X Checking ☐ Savings See **d** Account number | 2 | 3 | 0 | 3 | 1 | 7 | 5 | 7 | 7 instructions. e If you want your refund check mailed to an address outside the United States not shown on page 1, enter it here. 74 Amount of line 72 you want applied to your 2019 estimated tax ▶ Amount **75 Amount you owe.** Subtract line 71 from line 61. For details on how to pay, see instructions 75 You Owe Do you want to allow another person to discuss this return with the IRS? See instructions X No ☐ Yes. Complete below. **Third Party** Phone Personal identification Designee Designee's name ▶ number (PIN) no. **>** 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 Sign Here belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge. If the IRS sent you an Identity Your occupation in the United States Your signature Keep a copy of Date Protection PIN, enter it here this return for (see instr.) vour records. SOFTWARE ENGINEER Print/Type preparer's name Preparer's signature Date PTIN Check ☐ if Paid P02090332 APPANA RUPA VENKATA SATYA SAI MANIKUMAR self-employed Preparer Firm's name ► GLOBAL TAXES LLC Firm's EIN ▶ **Use Only** Firm's address ► 2530 Pebble Creek Ln Cumming GA 30041 Phone no.

Form 1040NR (2018)

Page 2

Form 1040NR (2018) Page **3**

Schedule A—Itemized Deductions (see instructions) 07 **Taxes You Paid** 1 State and local income taxes State and local income taxes 1a **b** Enter the smaller of line 1a and \$10,000 (\$5,000 if married) 1b 2 Gifts by cash or check. If you made any gift of \$250 or more, **Gifts** see instructions 2 to U.S. **Charities** Other than by cash or check. If you made any gift of \$250 or 3 more, see instructions. You must attach Form 8283 if the If you made a amount of your deduction is over \$500 3 gift and received a 4 benefit in Carryover from prior year 4 return, see instructions. 5 5 Add lines 2 through 4 Casualty Casualty and theft loss(es) from a federally declared disaster (other than net qualified and Theft disaster losses). Attach Form 4684 and enter the amount from line 18 of that form. See Losses 6 Other—from list in instructions. List type and amount ▶ Other **Itemized Deductions** 7 Total

Add the amounts in the far right column for lines 1b through 7. Also, enter this amount on

Itemized

Deductions

8

REV 05/02/19 PRO Form **1040NR** (2018)

8

		Schedule NEC-Tax on Income Not	Effectively	Co	nnected With	a U.S. Trade or	Business (see in	nstructions)	. 490
					Enter amount of i	ncome under the ap	propriate rate of tax	· · · · · · · · · · · · · · · · · · ·	
	Nature of income				(a) 10% (b) 1		(c) 30%	(d) Other	(specify)
					(4) 1070	(5) 1070	(0) 0070	%	%
1	Dividends and divide	•							
а	Dividends paid by U			1a					
b		reign corporations	_	1b					
С		payments received with respect to section							
				1c					
2	Interest:								
a			_	2a					
b		orations	_	2b					
С			_	2c					
3		patents, trademarks, etc.)		3					
4		/. copyright royalties	-	4					
5		rights, recording, publishing, etc.)	_	5					
6		e and natural resources royalties		6	<u> </u>				
7		ies	· · · ⊢	7	<u> </u>				
8		fits	· · · ⊢	8					
9		e 18 below	· · · -	9	,		,		
10	•	ts of Canada only. Enter net income in column	i (C).						
	If zero or less, ente	r -0							
a	Winnings								
b	Losses	·	1	l0c					
11		-Residents of countries other than Canada.							
40	OH(:6-)	owed		11					
12	Other (specify) ►			10					
40		10 in a clump (a) through (d)		12					
13		12 in columns (a) through (d)		13 14					
14 15		ate of tax at top of each column			dd aalumna (a) th	rough (d) of line	14 Enter the total	hara and an	
15		54							
	10111110401411, 11110	Capital Gains a						15	
Enter o	nly the capital gains and			110				(f) LOSS	(g) GAIN
losses	from property sales or	(a) Kind of property and description (if necessary, attach statement of	(b) Date acquired		(c) Date sold	(d) Sales price	(e) Cost or other	If (e) is more	If (d) is more
exchanges that are from sources within the United			(mo., day, yr.))	(mo., day, yr.)	(a) calco prico	basis	than (d), subtract (d) from (e)	than (e), subtract (e) from (d)
States and not effectively connected with a U.S. business.				+				.,	(4)
Do not include a gain or loss on disposing of a U.S. real				+					
propert	y interest; report these nd losses on Schedule D			+					
(Form 1				+					
	property sales or			_					
connec	ges that are effectively ted with a U.S. business	17 Add columns (f) and (g) of line 16 .					17	(
on Schedule D (Form 1040), Form 4797, or both.		18 Capital gain. Combine columns (f) and	 nd (a) of line 1	 17. F	nter the net gain	here and on line 9		enter -0-) 18	
		1	(9) 01 1110 1		uno mot gam	3 4114 511 1110 0	a. 2 7 2 (ii a 1300), c		

Form 1040NR (2018) Page **5**

		Schedule OI – Othe Ans	er Information (s swer all questions	ee instructions)						
Α	Of what country or countries	were vou a citizen or nation	al during the tax ve	ar? INDIA						
В	In what country did you clair	m residence for tax purposes	during the tax vear	? India						
С	Have you ever applied to be	a green card holder (lawful p	permanent resident)	of the United States? .	🗌 Yes 🗵 No					
D	Were you ever:		,							
1.		· · · · · · · · · · · · · · · · · · ·								
2.	A green card holder (lawful p	A green card holder (lawful permanent resident) of the United States?								
	If you answer "Yes" to (1) or (2), see Pub. 519, chapter 4, for expatriation rules that apply to you.									
E		t day of the tax year, enter y	our visa type. If yo	u did not have a visa, ente	er 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?										
	If you answered "Yes," indic	If you answered "Yes," indicate the date and nature of the change. ▶								
G	-	List all dates you entered and left the United States during 2018. See instructions.								
	Note: If you are 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									
					☐ Mexico					
	Date entered United States mm/dd/yy	Date departed United States mm/dd/yy		Date entered United States mm/dd/yy	Date departed United States mm/dd/yy					
	min/dd/yy	Hilli/dd/yy	_		IIIII/dd/yy					
			_							
			<u> </u>							
			<u> </u>							
			」 L							
Н	2016	ing vacation, nonworkdays, a , 2017	and partial days) yo and 201 , and	u were present in the Unite	d States during:					
I	Did you file a U.S. income ta	2016 , 2017 , and 2018 365 . Did you file a U.S. income tax return for any prior year?								
	If "Yes," give the latest year	and form number you filed $. $	>	1040NR						
J	Are you filing a return for a trust?									
	If "Yes," did the trust have a U.S. or foreign owner under the grantor trust rules, make a distribution or loan to a									
	U.S. person, or receive a contribution from a U.S. person?									
K										
	If "Yes," did you use an alternative method to determine the source of this compensation?									
L										
4	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.									
	· · · · · · · · · · · · · · · · · · ·		(b) Tax treaty	(c) Number of months	(d) Amount of exempt					
	(a) Co	ountry	article	claimed in prior tax yea						
					-					
	India		ARTICLE 21(2	2)	0.					
	(e) Total. Enter this amou	nt on Form 1040NR, line 22.	Do not enter it on li	ne 8 or line 12	0.					
2.	Were you subject to tax in a	Vere 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?								
		e Competent Authority deterr	mination letter to yo	ur return.						
M Check the applicable box if:										
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.	tou have made an election	in a previous year that has	not been revoked	, to treat income from rea	I property located in the United					

SCHEDULE E (Form 1040)

Supplemental Income and Loss

(From rental real estate, royalties, partnerships, S corporations, estates, trusts, REMICs, etc.)

► Attach to Form 1040, 1040NR, or Form 1041.

2018
Attachment

OMB No. 1545-0074

Department of the Treasury Internal Revenue Service (99) Name(s) shown on return

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

Attachment Sequence No. 13 Your social security number

	SH KUMAR MOVVA							5-55-563	
Part		-		-				•	
	Schedule C or C-EZ (see instructions). If you are an indiv								
	d you make any payments in 2018 that would require you t		. ,		•	,			
	Yes," did you or will you file required Forms 1099?							🗀	Yes No
<u>1a</u>	Physical address of each property (street, city, state, ZI)						
_ <u>A</u>	HYDERABAD HYDERABAD TELANGANA IN 500072								
B									
C					_		_		
1b	Type of Property (from list below) 2 For each rental real estate property listed above, report the number of fair rental and				Fair Rental Days		Personal Use Days		QJV
	personal use days. Check the	· QJV b	A particular by the structions.		365		0		
_ <u>A</u>	7 only if you meet the requirement a qualified joint venture. See in	ents to							
B	a qualified joint venture. See ii	HSHUCE							
C				С					
	of Property:								
-	gle Family Residence 3 Vacation/Short-Term Rental					lf-Rental			
	ti-Family Residence 4 Commercial		yalties		8 Ot	her (describe			
Incom	-	_		Α			В		С
3	Rents received	3			500	•			
4	Royalties received	4							
Expen		_							
5	Advertising	5							
6	Auto and travel (see instructions)	6							
7	Cleaning and maintenance	7							
8	Commissions	8							
9	Insurance	9							
10	Legal and other professional fees	10							
11	Management fees	11							
12	Mortgage interest paid to banks, etc. (see instructions)	12							
13	Other interest	13		5	,500	•			
14	Repairs	14							
15	Supplies	15							
16	Taxes	16							
17	Utilities	17							
18	Depreciation expense or depletion	18		9	,599	•			
19	Other (list)								
20	Total expenses. Add lines 5 through 19	20		15	,099	•			
21	Subtract line 20 from line 3 (rents) and/or 4 (royalties). If								
	result is a (loss), see instructions to find out if you must	- 1			-				
	file Form 6198	21		-14	,599	•			
22	Deductible rental real estate loss after limitation, if any,	- 1	,						
	on Form 8582 (see instructions)	22	(-14,)(
23a	Total of all amounts reported on line 3 for all rental properties of the state of t				23		50	U.	
b	Total of all amounts reported on line 4 for all royalty prop				23	_			
C	Total of all amounts reported on line 12 for all properties				23		0.50		
d	, , ,				23		9,59		
е						15,09			
24	Income. Add positive amounts shown on line 21. Do no						_	24	
25	Losses. Add royalty losses from line 21 and rental real estate	e losse	s from l	ine 22. I	Enter t	otal losses he	ere .	25 (14,599.
26	Total rental real estate and royalty income or (loss).								
	here. If Parts II, III, IV, and line 40 on page 2 do not		-						
	Schedule 1 (Form 1040), line 17, or Form 1040NR, line	18. Of	therwis	se. inclu	ude th	is amount in	the		

total on line 41 on page 2.

-14,599.

Form **4562**

Depreciation and Amortization

(Including Information on Listed Property)

► Attach to your tax return.

► Go to www.irs.gov/Form4562 for instructions and the latest information.

OMB No. 1545-0172

2018
Attachment
Sequence No. 179

Department of the Treasury
Internal Revenue Service (99)
Name(s) shown on return

Business or activity to which this form relates

Identifying number

DINESH KUMAR MOVVA Sch E HYDERABAD 866-55-5630 **Election To Expense Certain Property Under Section 179** Part I Note: If you have any listed property, complete Part V before you complete Part I. 1 1,000,000. 2 3 Threshold cost of section 179 property before reduction in limitation (see instructions) . 2,500,000 4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing 5 (a) Description of property (b) Cost (business use only) (c) Elected cost 6 7 Listed property. Enter the amount from line 29 8 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 8 9 Tentative deduction. Enter the smaller of line 5 or line 8 9 **10** Carryover of disallowed deduction from line 13 of your 2017 Form 4562 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions. 11 12 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11. 12 13 Carryover of disallowed deduction to 2019. Add lines 9 and 10, less line 12 Note: Don't use Part II or Part III below for listed property. Instead, use Part V. Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) 14 Special depreciation allowance for qualified property (other than listed property) placed in service 14 9,599. 15 **16** Other depreciation (including ACRS) 16 Part III MACRS Depreciation (Don't include listed property. See instructions.) **Section A** 17 MACRS deductions for assets placed in service in tax years beginning before 2018 17 18 If you are electing to group any assets placed in service during the tax year into one or more general Section B-Assets Placed in Service During 2018 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (a) Classification of property (business/investment use only—see instructions) (e) Convention (f) Method (g) Depreciation deduction placed in period service **19a** 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property **f** 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MM S/L h Residential rental S/L 27.5 yrs. MM property S/L 39 yrs. ММ i Nonresidential real property MM S/L Section C-Assets Placed in Service During 2018 Tax Year Using the Alternative Depreciation System 20a Class life S/L **b** 12-year 12 yrs. ММ S/L c 30-year 30 yrs. ММ S/L d 40-year 40 yrs. Part IV Summary (See instructions.) 21 Listed property. Enter amount from line 28 21 . 22 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations—see instructions 22 9,599. For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs 23