Exempt Organization Business Income Tax Return (and proxy tax under section 6033(e))

OMB No. 1545-0047

			- 1	(D) (D)
	For cale	endar year 2022 or other tax year beginning, 2022, and ending, 20	اا	20 22
Department of the Treasury Internal Revenue Service	Do no	Go to www.irs.gov/Form990T for instructions and the latest information. of enter SSN numbers on this form as it may be made public if your organization is a 501(c		Open to Public Inspection for 501(c)(3) Organizations Only
A Check box if			D Emplo	yer identification numbe
address changed.	Print	THE COMMUNITY FOUNDATION FOR NORTHEAST FLORIDA, INC.	59-6	6150746
B Exempt under section	or			exemption number
▼ 501(c)(3)	Туре	245 RIVERSIDE AVENUE, 310	(see ins	structions)
408(e) 220(e)		City or town, state or province, country, and ZIP or foreign postal code		
408A 530(a)				heck box if
529(a) 529A		value of all assets at end of year		amended return.
G Check organization				college/university
H Check if filing only		☐ Claim credit from Form 8941 ☐ Claim a refund shown on Form 2		
		nization filing a consolidated return with a 501(c)(2) titleholding corporation .		
J Enter the number	of attac	ched Schedules A (Form 990-T)		2
		he corporation a subsidiary in an affiliated group or a parent-subsidiary controlle	d group	o? 🗌 Yes 🛛 🗵 No
		and identifying number of the parent corporation		
		245 Riverside Avenue, Suite 310 Jacksonville FL 32202 Telephone number	(904) 356-4483
		ed Business Taxable Income	-	-1
		siness taxable income computed from all unrelated trades or businesses (s		
,			1	
			. 2	
				27.337.130
		ns (see instructions for limitation rules)	_	200/300.
		ess taxable income before net operating losses. Subtract line 4 from line 3 .		E/OUD/UEE.
		rating loss. See instructions		430,223.
		siness taxable income before specific deduction and section 199A deduction		
Subtract line 6				2,102,000.
•		enerally \$1,000, but see instructions for exceptions)	3	2/000.
		deduction. See instructions	. 9	
		d lines 8 and 9	. 10	1,000.
		taxable income. Subtract line 10 from line 7. If line 10 is greater than line		
		<u> </u>	· 11	2,131,598.
Part II Tax Con				
_		e as corporations. Multiply Part I, line 11 by 21% (0.21)		447,636.
		ist rates. See instructions for tax computation. Income tax on the amount		
		Tax rate schedule or Schedule D (Form 1041)	. 2	
•		otions	. 3	0.
4 Other tax amou	unts. Se	ee instructions	. 4	0.
5 Alternative min	imum ta	ex (trusts only)	. 5	

For Paperwork Reduction Act Notice, see instructions.

Tax on noncompliant facility income. See instructions

Total. Add lines 3 through 6 to line 1 or 2, whichever applles

REV 05/17/23 PRO

Form **990-T** (2022)

447,636.

0.

6

7

Part	Ш	Tax and Payments					
1a		gn tax credit (corporations attach Form 1118; trusts attach Form 1116)	1a				
b		-	1b				
С			1c		8		
d		· · · · · · · · · · · · · · · · · · ·	1d				
е		credits. Add lines 1a through 1d		(4)	1e		
2	Subt	ract line 1e from Part II, line 7			2	44	7,636.
3		amounts due. Check if from: Form 4255 Form 8611 Form 86		66			
		Other (attach statement)			3		
4	Tota	tax. Add lines 2 and 3 (see instructions). Check if includes tax previous	ously deferred un	der			
		on 1294. Enter tax amount here			4	44	7,636.
5	Curre	ent net 965 tax liability paid from Form 965-A, Part II, column (k) 🗼	. (6)		5		
6a	Paym	ents: A 2021 overpayment credited to 2022	6a				
b	2022	estimated tax payments. Check if section 643(g) election applies	6b				
C	Tax o	leposited with Form 8868	6c				
d	Forei	gn organizations: Tax paid or withheld at source (see instructions) .	6d				
е	Back	up withholding (see instructions)	6e				
f	Cred	t for small employer health insurance premiums (attach Form 8941) .	6f		100		
g	Other	credits, adjustments, and payments: Form 2439			EU I		
	□ Fo	orm 4136 Other Total _6	6g				
7		payments. Add lines 6a through 6g			7		0.
8		ated tax penalty (see instructions). Check if Form 2220 is attached			8		0.
9		lue. If line 7 is smaller than the total of lines 4, 5, and 8, enter amount owe			9	447	7,636.
10		payment. If line 7 is larger than the total of lines 4, 5, and 8, enter amount	•		10		
11		the amount of line 10 you want: Credited to 2023 estimated tax	Refun		11		
Part I	NAME OF TAXABLE PARTY.	Statements Regarding Certain Activities and Other Information					-
1		y time during the 2022 calendar year, did the organization have an interes					es No
		a financial account (bank, securities, or other) in a foreign country? If "Yes					
		N Form 114, Report of Foreign Bank and Financial Accounts. If "Yes," er	nter the name of t	ne tor	eign cou	ntry	
	here						×
2		the tax year, did the organization receive a distribution from, or was it the gran	itor of, or transferoi	r to, a	foreign tr	ust?	×
_		s," see instructions for other forms the organization may have to file.					
3		the amount of tax-exempt interest received or accrued during the tax yea		7 10			24 IS
4	ehow	available pre-2018 NOL carryovers here \$. Do not include on Schedule A (Form 990-T). Don't reduce the NOL carryover shown	here by any dedi	/ NO	reported	er Lon	
		line 6.	note by any dead	CLIOIT	reported	. 011	
5		2017 NOL carryovers. Enter the Business Activity Code and available post-	-2017 NOL carryo	vare l	Don't rad	luce	
•		nounts shown below by any NOL claimed on any Schedule A, Part II, line 17					8 13-
			vailable post-2017				
	5230		valiable post-2011		090,60		
	5250				050,00		
6a	Did th	e organization change its method of accounting? (see instructions)					×
b	If 6a	s "Yes," has the organization described the change on Form 990, 990-E	Z, 990-PF, or Fo	rm 11	28? If "N	No,"	03 100
	expla	n in Part V					
Part '	V	Supplemental Information					
Provide	_	explanation required by Part IV, line 6b. Also, provide any other additional i	information. See in	nstruc	tions.		
		penalties of perjury, I declare that I have examined this return, including accompanying sche					ledge and
Sign	belief,	it is true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all in	nformation of which pre	parer h	as any kno	wledge.	
_		14.0			May the IR	S discuss t	his return
Here		Sarva 11/16/2023 EUP/	cfo			eparer show	
	Signa	ture of officer Date Title			(See IIISTIU	ctions)? 🔲 Y	es KINO
Paid		Print/Type preparer's name Preparer's signature	Date	Chec	k 🔲 if	PTIN	
Prepa	ror	filed electronically		self-e	mployed		
Jse (Firm's name		Firm's	EIN		
72C (/111Y	Firm's address		Phone			

SCHEDULE A (Form 990-T)

Unrelated Business Taxable Income From an Unrelated Trade or Business

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service

Go to www.irs.gov/Form990T for instructions and the latest information. Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3). Open to Public Inspection for 501(c)(3) Organizations Only

B Employer identification number A Name of the organization 59-6150746 THE COMMUNITY FOUNDATION FOR NORTHEAST FLORIDA, INC. C Unrelated business activity code (see instructions) **D** Sequence: - 523000 1 of

C Un	related business activity code (see instructions)	- 5	23000	D Sequence:		1 of 2
E Do	scribe the unrelated trade or business Investment in li					
		rmi re	ed parthershi	ps		
Pa	Unrelated Trade or Business Income		(A) Income	(B) Expens	es	(C) Net
1a	Gross receipts or sales				1.5	S-MEDITOR
b	Less returns and allowances c Balance	1c			ME !	
2	Cost of goods sold (Part III, line 8)	2				
3	Gross profit. Subtract line 2 from line 1c	3				
4a	Capital gain net income (attach Schedule D (Form 1041 or					
	Form 1120)). See instructions	4a				
b	Net gain (loss) (Form 4797) (attach Form 4797). See					
	instructions	4b				
C	Capital loss deduction for trusts	4c				
5	Income (loss) from a partnership or an S corporation (attach					
	statement) See STMT.	5	80,839.			80,839
6	Rent income (Part IV)	6				
7	Unrelated debt-financed income (Part V)	7				
8	Interest, annuities, royalties, and rents from a controlled					
	organization (Part VI)	8				
9	Investment income of section 501(c)(7), (9), or (17)					
	organizations (Part VII)	9				
10	Exploited exempt activity income (Part VIII)	10				
11	Advertising income (Part IX)	11				
12	Other income (see instructions; attach statement)	12				
13	Total. Combine lines 3 through 12	13	80,839.		0.	80,839.
Par			limitations on dec	ductions. Dec	ductions	must be
	directly connected with the unrelated business inco					
1	Compensation of officers, directors, and trustees (Part X)				1	22,077.
2	Salaries and wages				2	20,386.
3	Repairs and maintenance				3	
4	Bad debts				4	
5	Interest (attach statement). See instructions				5	
6	Taxes and licenses				6	3,553.
7	Depreciation (attach Form 4562). See instructions					
8	Less depreciation claimed in Part III and elsewhere on return $\ .$				8b	
9	Depletion				9	
10	Contributions to deferred compensation plans				10	
11	Employee benefit programs				11	7,232.
12	Excess exempt expenses (Part VIII)	. 3	(e) · · · (e) (e)	· · 30 35	12	
13	Excess readership costs (Part IX)			8 18	13	
14	Other deductions (attach statement) See. Othe				14	120,820.
15	Total deductions. Add lines 1 through 14			1 1 . 000 David I P . 46	15	174,068.
16	Unrelated business income before net operating loss deduction					
	column (C)				16	-93,229.
17	Deduction for net operating loss. See instructions				17	
18	Unrelated business taxable income. Subtract line 17 from line	e 16			18	-93,229.

BAA

_		11 1 61 1	.,		
		thod of inventory val			
1	Inventory at beginning of year				
2	Purchases				
3	Cost of labor				
4	Additional section 263A costs (attach statement)				
5	Other costs (attach statement)				
6	Total. Add lines 1 through 5				
7	Inventory at end of year				
8	Cost of goods sold. Subtract line 7 from line 6.		. CAL 1350		
9	Do the rules of section 263A (with respect to prop				? Yes No
_	Rent Income (From Real Property an				
1	Description of property (property street address,	city, state, ZIP code). Check if a dual-u	se. See instructions.	•
	A 🔲				
	В 🗌				
	C				
	D				
		Α	В	С	D
2	Rent received or accrued				
а	From personal property (if the percentage of				
	rent for personal property is more than 10% but not more than 50%)				
b	From real and personal property (if the				
	percentage of rent for personal property exceeds 50% or if the rent is based on profit or income).				
	Total rents received or accrued by property.				
C	Add lines 2a and 2b, columns A through D				
	Add lines 2a and 2b, coldinis A through b				
3	Total rents received or accrued. Add line 2c column	ns A through D. Enter	here and on Part I, I	ine 6, column (A)	
4	Deductions directly connected with the income	1			
7	in lines 2(a) and 2(b) (attach statement)				
	17 miles 2(a) and 2(a) (attach classificity 1 1 1			<u>\</u>	
5	Total deductions. Add line 4 columns A through	D. Enter here and or	n Part I, line 6, colu	mn (B) " _	
Par	t V Unrelated Debt-Financed Income (se	e instructions)			*
1	Description of debt-financed property (street add		code). Check if a c	lual-use. See instruc	tions.
	A \square	,,,,			
	ВП				
	C 🗆				
	D [
		Α	В	С	D
2	Gross income from or allocable to debt-financed				
	property				
3	Deductions directly connected with or allocable				
	to debt-financed property				
а	Straight line depreciation (attach statement) .				
b	Other deductions (attach statement)				
С	Total deductions (add lines 3a and 3b,				
	columns A through D)				
4	Amount of average acquisition debt on or allocable				
	to debt-financed property (attach statement)				
5	Average adjusted basis of or allocable to debt-				
	financed property (attach statement)				
6	Divide line 4 by line 5	%	%	%	%
7	Gross income reportable. Multiply line 2 by line 6				
8	Total gross income (add line 7, columns A throu	igh D). Enter here and	d on Part I. line 7	olumn (A)	
		.g = /. =			
9	Allocable deductions. Multiply line 3c by line 6				
10	Total allocable deductions. Add line 9, columns a	A through D. Enter he	ere and on Part I, lin	e 7, column (B)	
11	Total dividends - received deductions include	ed in line 10			

Part VI	Interest, Annuit	ties, Royaltie	es, and Rent	s fro	m Controlled Org	janizations (see instru	uction	is)	
			Exempt Controlled Organizations						
	me of controlled organization	2. Employer identification number	3. Net unrela income (los (see instruction	ss)	4. Total of specified payments made	5. Part of column 4 that is included in the controlling organization's gross income		Deductions directly connected with ncome in column 5	
(1)									
(2)									
(3)									
(4)									
			Nonexem	ot Co	ntrolled Organization	าร			
7.	Taxable income	inco	unrelated me (loss) structions)	9. Total of specified payments made		10. Part of column 9 that is included in the controlling organization's gross income	11. Deductions direct connected with income in column 10		
(1)									
(2)									
(3)									
(4)									
Totals .				 7), (9)		Enter here and on Part I, line 8, column (A))	er here and on Part I, line 8, column (B)	
	scription of income	2. Amoui	nt of income		3. Deductions lirectly connected attach statement)	4. Set-asides (attach statement)		Total deductions and set-asides and columns 3 and 4)	
(1)							-		
(2)									
(4)									
		Enter here	ts in column 2. and on Part I, column (A)				Add amounts in column 5. Enter here and on Part I, line 9, column (B)		
Totals .	Evaluited Every	nt Antivity: In	oomo Otha	u The	an Advantiaine les	nama (ana inaturation			
Part VIII	cription of exploited		come, Otne	rina	an Advertising inc	come (see instructions	5)		
	, ,		trada ar busir	2000	Enter here and an Dr	art I, line 10, column (A)	2		
							2		
	Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B)								
	*						3		
	Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7						4		
	•						5		
							6	-	
						han the amount on line			
4. E	nter here and on Par	rt II, line 12 .	98 980 188			8 9 9 · · · · · · · · · · · · · · · · ·	7		
D 4 4	4. Enter here and on Part II, line 12						0.1		

	rt IX Advertising Income				
1	Name(s) of periodical(s). Check box if	reporting two or more period	icale on a consolidat	ad basis	
'	A	reporting two or more period	icais on a consolidat	eu Dasis.	
	c 🛚				
	D 🗌 🌉				
Ente	amounts for each periodical listed above	e in the corresponding colum	nn.		
		A	В	С	D
2	Gross advertising income				
а	Add columns A through D. Enter here a	and on Part I, line 11, column	(A)		v <u></u>
3	Direct advertising costs by periodical				
а	Add columns A through D. Enter here a	and on Part I, line 11, column	(B)		41 <u> </u>
4	Advertising gain (loss). Subtract line 3 2. For any column in line 4 showing complete lines 5 through 8. For any c line 4 showing a loss or zero, do not c lines 5 through 7, and enter zero on line	g a gain, olumn in complete			
5	Readership costs				
6	Circulation income				
7	Excess readership costs. If line 6 is I				
•	line 5, subtract line 6 from line 5. If line than line 6, enter zero	5 is less			
8	Excess readership costs allowed				
Ü	deduction. For each column showing a line 4, enter the lesser of line 4 or line 7	a gain on			
а	- · · · · · · · · · · · · · · · · · · ·				
Dos	Part II, line 13			·_ · · · · · ·) <u>-</u>
Fai	Compensation of Officers, D	ilectors, and Trustees (s	- i		
	1. Name	2. Title	of	time devoted to business	 Compensation attributable to unrelated business
(1) (Grace M. Sacerdote, CPA	Exec. VP/CFO		6.8900%	20,011.
		President		0.4200%	1,452.
(2) N	vina M. Waters	TI COI GETT			
	Wina M. Waters John Zell	Vice President		0.4200%	
(3)	John Zell			0.4200%	614.
(3)				0.4200%	
(3) (4)	John Zell	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	
(3) (4) Tota	John Zell	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.
(3) (4) Tota	John Zell al. Enter here and on Part II, line 1	Vice President		%	614.

Explanation Statement

2022

Name(s)						Social Security Number
THE COMMUNITY	FOUNDATION	FOR	NORTHEAST	FLORIDA,	INC.	59-6150746

 Possible the unrelated trade or business:
 Investment in limited partnerships

 Form/Line:
 Schedule A (Form 990-T), Part I
 Line 5

 Explanation of:
 Income (Loss) Partnership S corpration Schedule

(a) Name of Partnership or S corporation	(b) Share of gross income	(c) Share of deductions	(d) Gain or (Loss)
Juniper Capital I LP	-53,693.		-53,693.
Juniper Capital II LP	7,473.		7,473.
Level Equity Growth Partners I LP	-38,094.		-38,094.
See Straddles and Compenents Schedule			165,153.
Total Amount (Part I, Line 5, Col A)	80,839.		80,839.

Total

Form 990 T Sch A (Investment in limited partnerships) -- Pt I, Ln 5 Stmt: Income (Loss) from P'ship or S corp Straddles and Compenents Schedule Continuation Statement

Name of Partnership or S corporation	Share of gross income	Share of deductions	Gain or (Loss)
Materra	-222,461.		-222,461.
Montauk Triguard Fund V LLP	-10,676.		-10,676.
Newbury Secondary Fund	155.		155.
Newlin Energy Fund II LP	14,452.		14,452.
Northgate IV LP	15,440.		15,440.
Northgage V LP	672.	===	672.
Park Street Private Capital Fund VII	2,497.		2,497.
Park Street Capital Natural Resources IV	165.		165.
Real Estate Recovery Fund LLC	69,130.		69,130.
Lindsay Goldberg IV AIV LP	162,137.		162,137.
Private Equity Investment Fund IV, LP	55.		55.
Lindsay Goldberg V LP	135,975.		135,975.
Lindsay Goldberg IV LP	-817.		-817.
Lindsay Goldberg IV REIT AIV LP	-17.		-17.
Lindsay Goldbert V RP AIV	-1,554		-1,554.
			165,153.

Additional Information From Sch A - (990-T): Unrelated Business Taxable Income from Unrelated Trade or Business (Investment in limited partnerships)

Sch A - (990-T): Unrelated Business Taxable Income from Unrelated Trade or Business (Investment in limited partnerships)

Part II: Other Deductions

Continuation Statement

Description		Amount		
Investment advisory fees on consulting UBI		105,543.		
IT costs/occupancy		15,277		
	Total	120,820		

Additional Information From 2022 Federal Exempt Tax Return

Sch A - (990-T): Unrelated Business Taxable Income from Unrelated Trade or Business (Investment in limited partnerships)

Part II, Line 6

Itemization Statement

Description	Amount
Employment taxes	2,560.
Foregn taxes	993.
	Total 3,553.

SCHEDULE A (Form 990-T)

Unrelated Business Taxable Income From an Unrelated Trade or Business

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service

A Name of the organization

Go to www.irs.gov/Form990T for instructions and the latest information. Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3). Open to Public Inspection for 501(c)(3) Organizations Only

B Employer identification number

THE	COMMUNITY FOUNDATION FOR NORTHEAST FLORIDA	, INC	C	59-615074	6	
C Un	related business activity code (see instructions)	. 5	23000	D Sequence:		2 of2
E De	scribe the unrelated trade or business Investment in S	Corp	poration			
Pa	Unrelated Trade or Business Income		(A) Income	(B) Expens	es	(C) Net
1a	Gross receipts or sales			RUPSE OF		WELL TO BE SAFE
b	Less returns and allowances c Balance	1c				
2	Cost of goods sold (Part III, line 8)	2				
3	Gross profit. Subtract line 2 from line 1c	3				
4a	Capital gain net income (attach Schedule D (Form 1041 or Form 1120)). See instructions	4a				
b	Net gain (loss) (Form 4797) (attach Form 4797). See instructions	4b			10.5	
С	Capital loss deduction for trusts	4c				
5	Income (loss) from a partnership or an S corporation (attach	10				
	statement) See STMT.	5	2,807,360			2,807,360.
6	Rent income (Part IV)	6				
7	Unrelated debt-financed income (Part V)	7				
8	Interest, annuities, royalties, and rents from a controlled					
	organization (Part VI)	8				
9	Investment income of section 501(c)(7), (9), or (17)					
	organizations (Part VII)	9				
10	Exploited exempt activity income (Part VIII)	10				
11	Advertising income (Part IX)	11				
12	Other income (see instructions; attach statement)	12				
13	Total. Combine lines 3 through 12	13				
Par	Deductions Not Taken Elsewhere See instruction directly connected with the unrelated business inco		limitations on de		ductio	ns must be
1	Compensation of officers, directors, and trustees (Part X)	(40)			1	5,040.
2	Salaries and wages	140		. Set 18: .	2	598.
3	Repairs and maintenance				3	
4	Bad debts				4	
5	Interest (attach statement). See instructions ,				5	
6	Taxes and licenses			181 185	6	346.
7	Depreciation (attach Form 4562). See instructions					
8	Less depreciation claimed in Part III and elsewhere on return .				8b	
9	Depletion				9	
10	Contributions to deferred compensation plans				10	
11	Employee benefit programs				11	1,157.
12	Excess exempt expenses (Part VIII)				12	
13	Excess readership costs (Part IX)	. Do	disting Stat	· · · ·	13	
14	Other deductions (attach statement)				14	443.
15 16	Total deductions. Add lines 1 through 14	n Quh	tract line 15 from	Part Llino 12	15	7,584.
10	column (C)				40	2 700 776
17	Deduction for net operating loss. See instructions				16 17	2,799,776.
17 18	Unrelated business taxable income. Subtract line 17 from lin				18	2,799,776.
10	Officiated profiless rayable income. Orbitact file 1/ Itom Iti	0 10		(e) (e)	10	4,100,110.

Par	t III Cost of Goods Sold Enter me	thod of inventory val	uation				
1	Inventory at beginning of year	(#) (#) (#)		1			
2	Purchases			2			
3	Cost of labor						
4	Additional section 263A costs (attach statement)						
5	Other costs (attach statement)		3	5			
6	Total. Add lines 1 through 5	2 1 1 (2) 1 1 2		6			
7	Inventory at end of year						
8	Cost of goods sold. Subtract line 7 from line 6.			111 /20			
9	Do the rules of section 263A (with respect to prop				on? 🗌 Yes 🗌 No		
	Rent Income (From Real Property an						
1	Description of property (property street address,	city, state, ZIP code). Check if a dual-u	se. See instruction	S.		
	A						
	B						
	C □						
	D [Α	В	С	D		
2	Rent received or accrued	A	B				
a	From personal property (if the percentage of						
u	rent for personal property is more than 10%						
	but not more than 50%)						
b	From real and personal property (if the						
	percentage of rent for personal property exceeds						
	50% or if the rent is based on profit or income) .						
C	Total rents received or accrued by property.						
	Add lines 2a and 2b, columns A through D						
3	Total rents received or accrued. Add line 2c column	as A through D. Entor I	horo and on Part I li	no 6 polumn (A)	***		
3		is A tillough D. Enter	nere and on Fart i, ii	Tie 6, Column (A)			
4	Deductions directly connected with the income						
	in lines 2(a) and 2(b) (attach statement)						
5	Total deductions. Add line 4 columns A through	D. Enter here and or	n Part I, line 6, colu	mn (B)			
Dor	V Unrelated Debt-Financed Income (se						
1 1	Description of debt-financed property (street add		code) Chack if a d	lual-uso Soo instru	etions		
•	A .	·		idal-doe. Oee motic	CHOIIS.		
	B [
	c						
	D						
	•	Α	В	С	D		
2	Gross income from or allocable to debt-financed						
	property						
3	Deductions directly connected with or allocable						
	to debt-financed property						
а	Straight line depreciation (attach statement) .						
b	Other deductions (attach statement)						
C	Total deductions (add lines 3a and 3b,						
	columns A through D)						
4	Amount of average acquisition debt on or allocable to debt-financed property (attach statement)						
5	Average adjusted basis of or allocable to debt-						
5	financed property (attach statement)						
6	Divide line 4 by line 5	%	%	%	%		
7	Gross income reportable. Multiply line 2 by line 6	76	70	70	76		
1							
8	Total gross income (add line 7, columns A throu	igh D). Enter here and	d on Part I, line 7, c	olumn (A) .			
9	Allocable deductions. Multiply line 3c by line 6						
10	Total allocable deductions. Add line 9, columns	A through D. Enter he	ere and on Part I, lin	ie 7, column (B)			
11	Total dividends - received deductions include	_					

1. Name of controlled organization 2. Employer identification number 3. Net unrelated income (loss) (see instructions) (1) (2) (3) (4) Nonexempt Controlled Organizations 7. Taxable income 8. Net urrelated income (loss) (see instructions) 8. Net urrelated income (loss) (see instructions) 9. Total of specified payments made 10. Part of column 9 that is included in the controlling organization's gross income 11) (2) (3) (4) Nonexempt Controlled Organizations 7. Taxable income 8. Net urrelated income (loss) (see instructions) 9. Total of specified payments made 4. Total of specified payments made Nonexempt Controlled Organizations 10. Part of column 9 that is included in the controlling organization's gross income 11) (2) (3) (4) Add column 5 and 10. Enter here and on Part I, line 8, column (A) Totals Totals 1. Description of income 2. Amount of income 3. Deductions directly connected (attach statement) 4. Set-asides (attach statement) 5. Total deductions and set-asides (add columns 3 and 4) (1) (2) (3) (4) 5. Total deductions and set-asides (add columns 3 and 4)	Part VI Interest, Annui	ties, Royaitie	Ities, and Rents from Controlled Organizations (see instructions) Exempt Controlled Organizations					IS)
Reserve Rese		identification	income (los	s)	4. Total of specified	5. Part of column 4 that is included in the controlling organization's		connected with
Nonexempt Controlled Organizations Nonexempt Controlled Organizations	(1)							
Nonexempt Controlled Organizations 10. Part of column 9 that is included in the controlling organization's gross income 11. Deductions directly connected with income in column 10 12. 13. Deductions directly connected with income in column 10 14. Description of income 15. Totals 15. Total description of income 16. Add columns 5 and 10. Enter here and on Part I, line 8, column (A) 16. Total of specified payments made 17. Description of income 16. Add columns 5 and 10. Enter here and on Part I, line 8, column (B) 16. Total deductions and set-asides (attach statement) 16. Total deductions and set-asides (attach statement) 17. Description of income 18. Add amounts in column 2. Enter here and on Part I, line 9, column (B) 18. Enter here and on Part I, line 9, column (B) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Enter here and on Part I, line 10, column (B) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Enter here and on Part I, line 10, column (B) 18. Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 18. Enter here and on Part I, line 10, column (B) 18. Exploit	(2)							
7. Taxable income 8. Net unrelated income (sos) (see instructions) 9. Total of specified payments made 10. Part of column 9 that is included in the controlling organization's gross income (4) Add columns 5 and 10. Enter here and on Part I, line 8, column (A) 11. Description of income 2. Amount of income 3. Deductions directly connected (attach statement) (1) (2) (3) (4) Part VII Investment Income of a Section 501(c)(7), (9), or (17) Organization (see instructions) 1. Description of income 2. Amount of income 3. Deductions directly connected (attach statement) (4) (5) (6) (7) (7) (8) Add columns 6 and 11. Enter here and on Part I, line 8, column (B) 5. Total deductions and set-asides (atdach statement) (8) (9) (1) (1) (2) (3) (4) Add amounts in column 2. Enter here and on Part I, line 9, column (A) (1) (2) (3) (4) Add amounts in column 2. Enter here and on Part I, line 9, column (A) (Add amounts in column 5. Enter here and on Part I, line 9, column (B) Totals Part VIII Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 1. Description of exploited activity: Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) 3. Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) 4. Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete line 5 through 7 5. Gross income from activity that is not unrelated business income Expenses attributable to income entered on line 5 Expenses attributable to income entered on line 6 Expenses attributable to income entered on line 6 Expenses exempt expenses. Subtract line 5 from line 6, but do not entere more than the amount on line	(3)							
7. Taxable income (loss) (see instructions) 8. Net unrelated income (loss) (see instructions) 9. Total of specified payments made 10. Part of column 9 that is included in the controlling organization's gross income 11. Deductions directly connected with income in column 10 Add columns 5 and 10. Enter here and on Part I, line 8, column (A) 11. Description of income 2. Amount of income directly connected (attach statement) 12. Add mounts in column 2. Enter here and on Part I, line 9, column (A) Add amounts in column 2. Enter here and on Part I, line 9, column (A) 12. Add amounts in column 2. Enter here and on Part I, line 9, column (A) 12. Add amounts in column 2. Enter here and on Part I, line 9, column (B) 13. Description of income (attach statement) Add amounts in column 2. Enter here and on Part I, line 9, column (B) 14. Set-asides (add columns 3 and 4) 15. Total deductions and set-asides (add columns 3 and 4) 16. Expenses directly connected with production of unrelated business. Enter here and on Part I, line 9, column (B) 15. Total deductions and set-asides (add columns 3 and 4) 16. Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 9, column (B) 17. Totals 18. Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7 19. Expenses attributable to income entered on line 5 10. Expenses attributable to income entered on line 6 Expenses expenses. Subtract line 5 from line 8, but do not enter more than the amount on line	(4)							
(t) (see instructions) (see instructions) payments made that it is included in the controlling organization's gross income in column 10 connected with income in column 10 gross income in column (a) gross income in column (b) and columns 5 and 10. Enter here and on Part I, line 8, column (b) and 11. Enter here and on Part I, line 8, column (c) gross income in column (c) gross in column (c) gross in column (c) gross income in column (c) gross income in column (c) gross in column			Nonexemp	t Co	ntrolled Organization	ns		
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Add columns 5 and 10. Enter here and on Part I, line 8, column (B) Totals 1. Description of income 2. Amount of income 3. Deductions directly connected (attach statement) (attach statement) Add amounts in column 2. Enter here and on Part I, line 9, column (B) Totals Part VII Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 1. Description of exploited activity: Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) Activity Income, Other Than Advertising Income (see instructions) Add amounts in column 5. Enter here and on Part I, line 10, column (A) Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) Activity Income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7 Gross income from activity that is not unrelated business income Expenses attributable to income entered on line 5 Expenses attributable to income entered on line 5 Expenses attributable to income entered on line 6, but do not enter more than the amount on line						=		
Totals								
1. Description of income 2. Amount of income 3. Deductions directly connected (attach statement) 4. Set-asides (attach statement) 5. Total deductions and set-asides (add columns 3 and 4) (1) (2) (3) (4) Add amounts in column 2. Enter here and on Part I, line 9, column (A) Totals Part VIII Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 1. Description of exploited activity: 2. Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) 3. Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) 4. Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7 Gross income from activity that is not unrelated business income 5. Total deductions and set-asides (attach statement) 4. Set-asides (attach statement) 5. Total deductions and set-asides (attach statement) 4. Set asides (attach statement) Add amounts in column 5. Enter here and on Part I, line 9, column (B) 2. Set a point in expense and on Part I, line 10, column (A) 3. Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (A) 3. Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (A) 4. Set asides (attach statement) Add amounts in column 5. Enter here and on Part I, line 9, column (B) 2. Set as unrelated business income (see instructions) 4. Set asides (attach statement) 5. Total deductions and set asides (attach statement) 4. Set asides (attach statement) Add amounts in column 5. Enter here and on Part I, line 9, column (B) 2. Set asides (attach statement) Add amounts in column 5. Enter here and on Part I, line 9, column (B) 2. Set asides (attach statement) Add amounts in column 5. Enter here and on Part I, line 9, column (B) 2. Set asides (attach statement) Add amounts in column 5. Enter here and on Pa						Enter here and on Part I, line 8, column (A)	Ent	er here and on Part I,
directly connected (attach statement) (blue specific spe	Part VII Investment Inc	ome of a Sec	tion 501(c)(7), (9), or (17) Organiza	ation (see instructions)	1	
(2) (3) (4) Add amounts in column 2. Enter here and on Part I, line 9, column (A) Totals	1. Description of income	2. Amou	nt of income		lirectly connected			and set-asides
Add amounts in column 2. Enter here and on Part I, line 9, column (A) Totals	(1)							
Add amounts in column 2. Enter here and on Part I, line 9, column (A) Totals	(2)							
Add amounts in column 2. Enter here and on Part I, line 9, column (A) Totals	(3)							
Enter here and on Part I, line 9, column (A) Totals	(4)							
Part VIII Exploited Exempt Activity Income, Other Than Advertising Income (see instructions) 1 Description of exploited activity: 2 Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) 3 Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B)		Enter here and on Part I,						
Description of exploited activity: Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B)				3111.0			Ļ	
Gross unrelated business income from trade or business. Enter here and on Part I, line 10, column (A) Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B) Net income (loss) from unrelated trade or business. Subtract line 3 from line 2. If a gain, complete lines 5 through 7 Gross income from activity that is not unrelated business income Expenses attributable to income entered on line 5 Excess exempt expenses. Subtract line 5 from line 6, but do not enter more than the amount on line			come, Othe	r Tha	an Advertising Inc	come (see instructions	5)	T
Expenses directly connected with production of unrelated business income. Enter here and on Part I, line 10, column (B)	•						William .	
line 10, column (B)							2	
lines 5 through 7	line 10, column (B)						3	
5 Gross income from activity that is not unrelated business income							4	
7 Excess exempt expenses. Subtract line 5 from line 6, but do not enter more than the amount on line							5	
7 Excess exempt expenses. Subtract line 5 from line 6, but do not enter more than the amount on line 4. Enter here and on Part II, line 12							6	
	7 Excess exempt expens4. Enter here and on Pa	ses. Subtract lin	ne 5 from line 6	, but	do not enter more t	han the amount on line	7	

	reporting two or more per	iodicals on a consc	lidated basis.	
A 🖂				
C				
r amounts for each periodical listed above	e in the corresponding co	lumn.		
, <u> </u>	A	В	С	D
Gross advertising income				
Add columns A through D. Enter here a	and on Part I, line 11, colu	ımn (A)		v 14
Direct advertising costs by periodical				
Add columns A through D. Enter here a	and on Part I, line 11, colu	ımn (B)	s · · · · · ·	,
Advertising gain (loss). Subtract line 3 of 2. For any column in line 4 showing complete lines 5 through 8. For any column 4 showing a loss or zero, do not column 5 through 7, and enter zero on lines 5 through 7, and enter zero on lines	a gain, olumn in complete			
Readership costs				
Circulation income				
Excess readership costs. If line 6 is le line 5, subtract line 6 from line 5. If line than line 6, enter zero	5 is less			
Excess readership costs allowed deduction. For each column showing a line 4, enter the lesser of line 4 or line 7	as a a gain on			
Add line 8, columns A through D. Ent		e 8a. columns tota	l or zero here and	on
_				· -
rt X Compensation of Officers, D	irectors, and Trustee	s (see instructions	s)	
			3. Percentage	4.0
1. Name	2. Title	e	of time devoted to business	 Compensation attributable to unrelated business
	2. Title	9	of time devoted	attributable to
		9	of time devoted to business 4.5000%	attributable to unrelated business
		ə	of time devoted to business 4.5000% %	attributable to unrelated business
		ə	of time devoted to business 4.5000%	attributable to unrelated business
Grace Sacerdote	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
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Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
Grace Sacerdote al. Enter here and on Part II, line 1	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040
1. Name Grace Sacerdote al. Enter here and on Part II, line 1 t XI Supplemental Information (se	EVP/CFO		of time devoted to business 4.5000% % % %	attributable to unrelated business 5,040

Explanation Statement

2022

Name(s)		T110	Social Security Number
THE COMMUNITY FOUNDATION FOR NO	DRTHEAST FLORIDA	A, INC.	59-6150746
Describe the unrelated trade or business:	Investment in S	Corporation	ב. ב
Form/Line: Schedule A (Form 99	00-T), Part I	Lir	ne 5
Explanation of: Income (Loss)	Partnership S c	corpration Sc	chedule
*			
(a)	(b)	(c)	(d)
Name of Partnership or S corporation	Share of gross income	Share of deductions	Gain or (Loss)
SRA/Buidling 051 Corporation	2,807,360.		2,807,360.
A =			
Total Amount (Part I, Line 5, Col A)	2,807,360.		2,807,360.

Additional Information From Sch A - (990-T): Unrelated Business Taxable Income from Unrelated Trade or Business (Investment in S Corporation)

Sch A - (990-T): Unrelated Business Taxable Income from Unrelated Trade or Business (Investment in S Corporation)

Part II: Other Deductions

Continuation Statement

Description	A	mount
Software/Occupancy costs		443.
	Total	443.

Additional Information From 2022 Federal Exempt Tax Return

Form 990-T: Exempt Organization Business Income Tax Return

Part I, Line 6

Itemization Statement

Description	Amount
Year 2009	
Year 2015	71,895.
Year 2016	130,470.
Year 2017	227,858.
1	Fotal 430,223.

Form 990-T: Exempt Organization Business Income Tax Return

Part III: Other Credits (1) Line 5 pst-2017 NOL cryvr

Itemization Statement

Description	Amount
Year 2018	528,571.
Year 2019	193,715.
Year 2020	447,239.
Year 2021	921,080.
Total	2,090,605.

(Rev. November 2018) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.
 ▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)			
Name o	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST F	Identifying number (see instructions) 59-6150746		
1 2 a	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a thr If the transfer was a section 361(a) or (b) transfer, was the five or fewer domestic corporations?	er section 368(c)) by		
~	If not, list the controlling shareholder(s) and their identifying n		•	
	Controlling shareholder	lde	ntifying number	
	If the transferor was a member of an affiliated group filli	ng a consolidated return	was it the parent	
C				
	If not, list the name and employer identification number (EIN)	of the parent corporation.		
	· Name of parent corporation	EIN of	parent corporation	
d	Have basis adjustments under section 367(a)(4) been made?		Yes . No	
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is n	ot treated as such under section 367)	
a	Name of partnership	EIN	l of partnership	
	realite of partitioning		, , , , , , , , , , , , , , , , , , , ,	
b	Did the partner pick up its pro rata share of gain on the transf	er of partnership assets?		
C	Is the partner disposing of its entire interest in the partnership. Is the partner disposing of an interest in a limited partnership.	o?	Yes No	
d	securities market?			
Part		e instructions)		
4 EN	Name of transferee (foreign corporation) IGAGED CAPITAL FLAGSHIP FUND, LTD.		5a Identifying number, if any	
6	Address (including country) ET SQUARE HUTCHINS DRIVE. PO BOX 2681 GRAND CAYMAN KY1	I-1111, CAYMAN ISLANDS	5b Reference ID number (see instructions) ENGAGED1	
7	Country code of country of incorporation or organization (see	instructions)		
8 OFF	Foreign law characterization (see instructions) SHORE EXEMPTED COMPANY			
9	Is the transferee foreign corporation a controlled foreign corporation	oration?	🗌 Yes 🗹 No	

Engaged

Section A—Ca		ing Transfer of Propert	y (see instructions)		
Type of	(a)	(b) Description of	(c)	(d) Cost or other	(e)
property	Date of transfer	Description of property	Fair market value on date of transfer	basis	Gain recognized on transfer
Cash	9/30/2022		4,000,00	00	
If "Yes," s	kip the remainder o	ransferred?			🗹 Yes 🗌 No
Section B-Othe		than intangible property			(a)
Type of property	(a) Date of transfer	(b) Description of property	Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with					
built-in loss					
Totais					
b Was the true (including a lif "Yes," color transferee life "Yes," color transferee li	o to line 12b. ansferor a domesti a branch that is a f ontinue to line 12c. ly after the transi foreign corporation ontinue to line 12d. ransferred loss am nsferor transfer pro	c corporation that transferr oreign disregarded entity) the lif "No," skip lines 12c and fer, was the domestic con?	ed substantially all of the control of a specified 10%-own 12d, and go to line 13. The control of the control o	ne assets of a foreign bed foreign corporation? cholder with respect t	ranch ? Yes No o the Yes No
Castian C. Inton	wikle Dreporty St	bject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's leng on date of	th price transfer Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)					
Totals					5 026 /D 11 0011

Engaged						
had	a	useful	life			

b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?	☐ Yes☐ Yes☐ Yes	□ No
Supp	lemental Part III Information Required To Be Reported (see instructions)		
Oupp			
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 %		
17	Type of nonrecognition transaction (see instructions) ► N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF	ORATION	
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	∐ Yes	✓ No
b	Gain recognition under section 904(f)(5)(F)	∐ Yes	☑ No
C	Recapture under section 1503(d)	∐ Yes	☑ No
d	Exchange gain under section 987	∐ Yes	☑ No
19	Did this transfer result from a change in entity classification?	∐ Yes	☑ NO
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.	∐ Yes	∠ No
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	☐ Yes	□ No
04	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
21	covered by section 367(e)(1)? See instructions	☐ Yes	☑ No
		orm 926 (R	

(Rev. November 2018) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.
 ▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)			
Name o	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST I	Identifying number (see instructions) 59-6150746		
1 2 a	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a th If the transfer was a section 361(a) or (b) transfer, was the	rough 2d.		
а	five or fewer domestic corporations?	280 280 380	₃₃ ∐ Yes ∐ No	
b	Did the transferor formalit in existence diter are transfer.	• • • • • 500 000 000 000 1000	Yes No	
	If not, list the controlling shareholder(s) and their identifying r	number(s).		
	Controlling shareholder	Identifying number		
С	If the transferor was a member of an affiliated group filicorporation?	ing a consolidated return,	, was it the parent □ Yes □ No	
	If not, list the name and employer identification number (EIN)	of the parent corporation.		
	Name of parent corporation	EIN of	parent corporation	
d	Have basis adjustments under section 367(a)(4) been made?		Yes 🗌 No	
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	e actual transferor (but is r	not treated as such under section 367),	
a	Name of partnership	EIN	l of partnership	
	Name of partiership	_	, o. parmoromp	
b	Did the partner pick up its pro rata share of gain on the trans	fer of partnership assets?	Yes 🗌 No	
С	Is the partner disposing of its entire interest in the partnershi	p?	Yes 🗌 No	
d	Is the partner disposing of an interest in a limited partners securities market?			
Part		e instructions)		
4	Name of transferee (foreign corporation) ARKER PARTNERSHIP FUND		5a Identifying number, if any	
6	Address (including country)		5b Reference ID number	
2F LA KY_1-	NDMARK SQUARE, 64 EARTH CLOSE, SEVEN MILE BEACH, GR 1201, CAYMAN ISLANDS	AND CAYMAN CJ	(see instructions) BARKER1	
7	Country code of country of incorporation or organization (see	instructions)		
8 OFF	Foreign law characterization (see instructions) SHORE EXEMPTED COMPANY			
9	Is the transferee foreign corporation a controlled foreign corp	oration?	Yes 🗹 No	

		ding Transfer of Proper	ty (see instructions)		
Section A-Ca				1-N	(-)
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	5/31/2022		2,537,2	220	
If "Yes," s	kip the remainder	transferred?	<i>'</i> .		v v Ves □ No
Section B-Oth	er Property (othe	r than intangible property			
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with					
built-in loss					
Totals					
12a Were any foreign could "Yes," go b Was the transferee If "Yes," could be transferee.	assets of a foreigrporation? o to line 12b. ansferor a domes a branch that is a continue to line 12c foreign corporation fortinue to line 12c ransferred loss ar nsferor transfer p	filed?	rred substantially all of to a specified 10%-owd 12d, and go to line 13 orporation a U.S. shad go to line 13. come as required under	garded entity) transferre the assets of a foreign b ned foreign corporation' reholder with respect t	oranch or the
Section C—Intar	naible Property S	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (c) Useful Arm's ler life on date o	d) ngth price of transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)					
Totals	mare Huller	THE WATER			
					Form 926 /Pay 11-2018

Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . \square Yes \square No

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$_____
c Did the domestic corporation not recognize gain or loss on the distribution of property because the

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

19

21

If "Yes," complete lines 20b and 20c.

covered by section 367(e)(1)? See instructions ☐ Yes ☑ No
Form 926 (Rev. 11-2018)

(Rev. November 2018) Department of the Treasury

Return by a U.S. Transferor of Property to a Foreign Corporation

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Attachment

Sequence No. 128 Internal Revenue Service Part I U.S. Transferor Information (see instructions) Identifying number (see instructions) Name of transferor THE COMMUNITY FOUNDATION FOR NORTHEAST FLORIDA, INC 59-6150746 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . \square Yes \square No If the transferor was a corporation, complete questions 2a through 2d. 2 a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by ✓ Yes
☐ No. If not, list the controlling shareholder(s) and their identifying number(s). Identifying number Controlling shareholder c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent Yes 🗌 No If not, list the name and employer identification number (EIN) of the parent corporation. **EIN** of parent corporation Name of parent corporation Yes No If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d. a List the name and EIN of the transferor's partnership. **EIN** of partnership Name of partnership b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established ☐ Yes ☐ No Transferee Foreign Corporation Information (see instructions) 5a Identifying number, if any Name of transferee (foreign corporation) DIGITAL ALPHA FUND II 5b Reference ID number Address (including country) (see instructions) MAPLES CORPORATE SERVICES LIMITED, PO BOX 309, UGLAND HOUSE, GRAND CAYMAN DIGITAL2 ISLANDS KY1-1104 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) 8 OFFSHORE EXEMPTED COMPANY ☐ Yes
☑ No Is the transferee foreign corporation a controlled foreign corporation? .

		ding Transfer of Propert	y (see instructions)		0
Section A—Ca	sh (a)	(b)	(c)	(d)	(e)
Type of property	Date of transfer	(b) Description of property	Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Cash	VARIOUS 20)22	488,6	66	
lf "Yes," sl	kip the remainder	transferred? of Part III and go to Part IV.		. 5 8 %	🗹 Yes 🗌 No
Section B-Othe	r Property (othe	r than intangible property :	subject to section 367	7(d))	
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Involtory					
Other property (not listed under					
another category)					
Property with					WELL PRINCE
built-in loss					
Totals					
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the train	poration?	tic corporation that transferr foreign disregarded entity) to If "No," skip lines 12c and afer, was the domestic coon?	red substantially all of to a specified 10%-own 12d, and go to line 13 rporation a U.S. shar	the assets of a foreign bened foreign corporation eholder with respect the section 91 > \$	oranch ? Yes No to the Yes No
Section C _ Intan	gible Property S	ubject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d Useful Arm's len life on date o	gth price f transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					
n sec. 367(d)(4)					
Totals					
otals				, i	Form 926 (Rev. 11-2018)

V	(a	:1	- -24-	1
-4-	-	(1	n	
	V			

14a b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?	∐ Yes ∐ Yes	☐ No
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$		
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	☐ Yes	□ No
Supp	plemental Part III Information Required To Be Reported (see instructions)		
_			
Part	Additional Information Regarding Transfer of Property (see instructions)		
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
Part	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.	PORATION	
16 17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORP	PORATION	
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following.		
16 17 18 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3) .	☐ Yes	✓ No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(5)(F)	☐ Yes ☐ Yes	✓ No ✓ No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) ► N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)	☐ Yes ☐ Yes ☐ Yes	☑ No ☑ No ☑ No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3) . Gain recognition under section 904(f)(5)(F)	☐ Yes☐ Yes☐ Yes☐ Yes	✓ No ✓ No ✓ No ✓ No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3) . Gain recognition under section 904(f)(5)(F) . Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes ☐ Yes ☐ Yes	No No No No No No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)	☐ Yes ☐ Yes ☐ Yes ☐ Yes ☐ Yes ☐ Yes	No No No No No No
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) ▶ N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)	☐ Yes	No No No No No No
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) ▶ N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)	☐ Yes	No No No No No No No No
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) ▶ N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3) . Gain recognition under section 904(f)(5)(F)	☐ Yes	No No No No No No No No
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3) . Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) . Exchange gain under section 987 . Did this transfer result from a change in entity classification? . Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$ Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? . Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	☐ Yes	No No No No No No No No
16 17 18 a b c d 19 20a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before UNDER 5 % (b) After UNDER 5 % Type of nonrecognition transaction (see instructions) N/A-CASH TRANSFER OF \$100,000+ TO FOREIGN CORF Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3). Gain recognition under section 904(f)(5)(F). Recapture under section 1503(d). Exchange gain under section 987. Did this transfer result from a change in entity classification?. Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?. Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions	☐ Yes	No No No No No No No No

(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

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 Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)				
Name o	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST		Identifying number (see 59-6150746		
1 2 a b	2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?				
	Controlling shareholder	Ide	ntifying number		
С	If the transferor was a member of an affiliated group fill corporation?	ing a consolidated return,	was it the parent	☐ Yes ☐ No	
	If not, list the name and employer identification number (EIN)	of the parent corporation.			
	Name of parent corporation	EIN of	parent corporation		
d	Have basis adjustments under section 367(a)(4) been made?		(981-1980) (983-1986) (980-1980) • 1987	☐ Yes ☐ No	
3 a	If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	e actual transferor (but is r	ot treated as such u	nder section 367),	
- 4	Name of partnership	EIN	l of partnership		
DAVI	DSON KEMPNER INSTITUTIONAL PARTNERS LP	13-3597020			
b c d	Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its entire interest in the partnershi is the partner disposing of an interest in a limited partners securities market?	p?	on an established	☐ Yes ☐ No ☐ Yes ☐ No ☐ Yes ☐ No	
Part		ee instructions)			
4 Dł	Name of transferee (foreign corporation) (IP (CAYMAN) II LP		5a Identifying nun FOREIGNUS	nber, if any	
6 190 E	Address (including country) LGIN AVENUE GEORGE TOWN, GRAND KAYMAN KY 1-9005,	CAYMAN ISLANDS	5b Reference ID nu (see instructions) DAVIDSON1	ımber	
7	Country code of country of incorporation or organization (see	e instructions)			
8 COI	Foreign law characterization (see instructions) RPORATION				
9	Is the transferee foreign corporation a controlled foreign corp	oration?		☐ Yes 🗹 No	

Davidson

		Transfer of Property	(see instructions)		
Section A—Ca				(-D	(4)
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	VARIOUS		1,127,6	16	
If "Yes," sl	kip the remainder of P	sferred?		7(d))	✓ Yes 🗌 No
	(a)	(b)	(c)	(d)	(e)
Type of property	Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
built-in ioss					
Totals					
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the trai	poration?	orporation that transferred gn disregarded entity) to No," skip lines 12c and was the domestic cornection	ed substantially all of to a specified 10%-own 12d, and go to line 13 poration a U.S. sharton to line 13. The poto line 13. The poto line 13. The poto line 13.	eholder with respect t	ranch o the Yes No No
Section C-Intan	gible Property Subje	ct to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d Useful Arm's len on date o	gth price f transfer (e) (c) (c) (c) (c) (c) (c) (d) (d) (d) (d) (d) (d) (d) (d) (d) (d	(f) Income inclusion for year of transfer (see instructions)
Property described n sec. 367(d)(4)					
oraio					Form 926 (Rev. 11-2018)

Form 9	26 (Rev. 11-2018) 59-615074b	Davidson Page 3
14a b c	reasonably anticipated to exceed 20 years?	Yes No life? Yes No ns section Yes No
d	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period de Regulations section 1.367(d)-1(c)(3)(ii) > \$	escribed in
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfe time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	roratany Yes . No
Supp	plemental Part III Information Required To Be Reported (see instructions)	
-		
	W. T. J. C. J. D. W. T. J. C. J. Durbanks (and instructions)	
Part	Additional Information Regarding Transfer of Property (see instructions)	
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.	
10	(a) Before UNDER 5 % (b) After UNDER 5 %	
17	Type of nonrecognition transaction (see instructions) ► IRC 351	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а	Gain recognition under section 904(f)(3)	🗌 Yes 🗹 No
b	Gain recognition under section 904(f)(5)(F)	
C	Recapture under section 1503(d)	∐ Yes ☑ No
d	Exchange gain under section 987	∐ Yes ⊮ No
19	Did this transfer result from a change in entity classification?	L Yes L No
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See inst	ructions. Tes No
le.	If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ 5	¢
b	Effect the total amount of gain of loss recognized pursuant to negulations section 7.507 (c) 2(b)	Ψ

c Did the domestic corporation not recognize gain or loss on the distribution of property because the

21

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

Form **926** (Rev. 11-2018)

(Rev. November 2018)

Return by a U.S. Transferor of Property to a Foreign Corporation

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Attach to your income tax return f

Part I U.S. Transferor Information (see instructions) ▶ Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Name o	of transferor		Identifying number (see instructions)
TI	HE COMMUNITY FOUNDATION FOR NORTHEAST †		59-6150746
1 2	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a th	rough 2d.	
а	If the transfer was a section 361(a) or (b) transfer, was the	transferor controlled (unde	r section 368(c)) by
	five or fewer domestic corporations?		
b	Did the transferor remain in existence after the transfer?	· · · · · · · · · · · · · · · · · · ·	Tes 🗆 No
	If not, list the controlling shareholder(s) and their identifying r	iumber(s).	
	Controlling shareholder	Ide	ntifying number
С	If the transferor was a member of an affiliated group fill corporation?	ing a consolidated return,	was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?	• (4) (4) (4) (4) (4) (4)	Yes No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	e actual transferor (but is n	ot treated as such under section 367)
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EIN	of partnership
TIFF	DIVERSIFYING STRATEGIES FUND, LP	83-2530183	
b	Did the partner pick up its pro rata share of gain on the trans	fer of partnership assets?	Yes 🗌 No
С	Is the partner disposing of its entire interest in the partnershi	ip?	Yes ☑ No
d	Is the partner disposing of an interest in a limited partners		
	securities market?	o instructions)	Yes 🗹 No
Part		e instructions)	5a Identifying number, if any
4 KE	Name of transferee (foreign corporation) EEL CAPITAL FOGHORN FUND X2		FOREIGNUS
6	Address (including country)		5b Reference ID number
3 RUE	E GABRIEL LIPPMANN L-5365 MUNSBACH LUXEMBOURG LU		(see instructions) TIFF1
7	Country code of country of incorporation or organization (see	e instructions)	
	LU		
8 COI	Foreign law characterization (see instructions) RPORATION Is the transferee foreign corporation a controlled foreign corp		· · · · · · · · · · · · · Yes 🗹 No

59.6150746

		ding Transfer of Property	y (see instruction	s)		11
Section A—Ca Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value date of transfe		(d) Cost or other basis	(e) Gain recognized on transfer
Cash	8/02/2021	ргорогту		44,410		
10 Was cash	the only property	rtransferred?				∵ . ✓ Yes □ No
Section B—Othe	r Property (other	er than intangible property s	subject to section	367(d))		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value date of transfe		(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Built-ii1 1000						
Totals						
recognition 12a Were any a foreign cor If "Yes," go b Was the transferee If "Yes," co c Immediate transferee If "Yes," co d Enter the trans If "No," ski	agreement was assets of a foreign poration?	d. If "No," skip line 12d, and on the second included in gross incoluded in section questions 14a through 15.	that is a foreign dited substantially all o a specified 10%-12d, and go to line rporation a U.S. so go to line 13.	sregarded of the assertion a13. shareholder	entity) transferred ets of a foreign beign corporation? with respect to	Yes No d to a Yes No ranch Yes No the Yes No
Section C—Intan	gible Property	Subject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful Arm' life on da	(d) s length price ate of transfer	(e) Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described n sec. 367(d)(4)						
otals						
OLUIO			*			Form 926 (Rev. 11-2018)

Form 9	26 (Rev. 11-2018)	59.615074b	TY		Page 3
14a b c	reasonably antic At the time of the Did the transfe 1.367(d)-1(c)(3)(cipated to exceed 20 years ne transfer, did any of the transfer, did any of the transfer choose to apply the ii) for any intangible propertion	ansferred intangible property have an indefinite useful life? . 20-year inclusion period provided under Regulations sect ty?		☐ No
d	to the intangible Regulations sec	e property's, or properties' tion 1.367(d)-1(c)(3)(ii) ▶ \$	total estimated anticipated income or cost reduction attributa ', as applicable, use(s) beyond the 20-year period described nsidered or anticipated to be, at the time of the transfer or at a	l in	
15	Was any intangi time thereafter,	a platform contribution as o	defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
Supp	olemental Part	II Information Required	d To Be Reported (see instructions)		
Part	V Additiona	l Information Regardin	g Transfer of Property (see instructions)		
16	Enter the transfe	eror's interest in the transfe	ree foreign corporation before and after the transfer.		
	(a) Before UND	R 5 % (b) After UNDER	5_%		
17	Type of nonreco	gnition transaction (see ins	structions) > IRC 351		
18	Indicate whether	r any transfer reported in Pa	art III is subject to any of the following.		
а	Gain recognition	under section 904(f)(3) .	100 TONG CONT.	. L Yes	☑ No
b	Gain recognition	under section 904(f)(5)(F)	145 TAP 145 TAP 145 TAP 145 TAP 146 TAP	. U Yes	☑ No
C	Recapture unde	r section 1503(d)	(\$\frac{1}{2}\$ (\$\frac{1}{2}\$ (\$\frac{1}{2}\$)	. ∐ Yes	☑ No
d	Exchange gain u	ınder section 987		∐ Yes	☑ No
19	Did this transfer	result from a change in ent	ity classification?	. ∐ Yes	✓ No
20a			ition of property covered by section 367(e)(2)? See instructions	;. ∐ Yes	∠ No
		te lines 20b and 20c.			
b			nized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	property was us-	ed in the conduct of U.S. tr	nize gain or loss on the distribution of property because trade or business under Regulations section 1.367(e)-2(b)(2)?	. 🗌 Yes	□ No
21			on 355 distribution of stock in a foreign controlled corporati		
	covered by secti	on 367(e)(1)? See instruction	ons	· Yes	
			2	Form 926 (R	iev. 11-2018)

(Rev. November 2018) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

▶ Go to www.irs.gov/Form926 for instructions and the latest information.
 ▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Part	U.S. Transferor Information (see instructions)		111 116:
Name o	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST I		Identifying number (see instructions) 59-6150746
1 2 a	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a the If the transfer was a section 361(a) or (b) transfer, was the	rough 2d. transferor controlled (unde	er section 368(c)) by
b	five or fewer domestic corporations?		
	Controlling shareholder	Ide	entifying number
	If the transferor was a member of an affiliated group fill	ing a consolidated return	was it the parent
С			
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?	260 360 1861 1861 1861 1861 1860 1860 1860 3601 3601 1861 1861 1861 1861 1860 1860	
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	e actual transferor (but is r	not treated as such under section 367
a	Name of partnership	EIN	N of partnership
TIFF	DIVERSIFYING STRATEGIES FUND, LP	83-2530183	
С	Did the partner pick up its pro rata share of gain on the trans- ls the partner disposing of its entire interest in the partnershi ls the partner disposing of an interest in a limited partners	p?	☐ Yes ☑ No d on an established
Part	securities market?	ee instructions)	Yes 🗹 No
4	Name of transferee (foreign corporation) ORT GLOBAL OFFSHORE FUND, SPC	,	5a Identifying number , if any FOREIGNUS
6 C/O M	Address (including country) IAPLES CORPORATE SERVICES LIMITED PO BOX 309 UGLA I, CAYMAN ISLANDS KY-1104	ND HOUSE GEORGE	5b Reference ID number (see instructions) TIFF2
7	Country code of country of incorporation or organization (see	instructions)	
8 COF	Foreign law characterization (see instructions)		
9	Is the transferee foreign corporation a controlled foreign corp	oration?	🗌 Yes 🗹 No

10 Was cash the only property transferred?			ding transfer of Property	(See manuchons)		
Description Description Description Pair mark value on Coat is other basis Cast in Cast			(b)	(c)	(d)	(e)
10 Was cash the only property transferred?	* *	Date of transfer		Fair market value on	Cost or other	Gain recognized on
Section B—Other Property (other than intangible property subject to section 367(d)) Type of property Get Get Description of property Description of transfer Description of transfer Description of property Description of property Description of transfer Description of Descrip	Cash	4/02/2022		397,1	27	
Type of property Date of prope	If "Yes," sl	kip the remainder	of Part III and go to Part IV.		7(4))	Yes □ No
Date of property Date of transfer Date of tra	Section B—Othe					(e)
Other property (not listed under another category) Property with built-in loss	• •	Date of	Description of	Fair market value on	Cost or other	Gain recognized on
Other property (not listed under another category) Property with	Stock and securities					
Property with Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?	Inventory					
Totals 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?	Other property (not listed under another category)					
Totals 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?	Dunmouteeselth					
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?	built-in loss					
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?						
recognition agreement was filed?	Totals					
Type of property Date of transfer Description of property Descri	foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the transferee	poration? o to line 12b. ansferor a domes a branch that is a continue to line 12d after the transforeign corporation tinue to line 12d ransferred loss ar ansferor transfer p	atic corporation that transferred foreign disregarded entity) to c. If "No," skip lines 12c and 1 after, was the domestic corpon?	ed substantially all of to a specified 10%-own 12d, and go to line 13 poration a U.S. share	the assets of a foreigned foreign corporal. reholder with respendents.	gn branch tion? Yes No
Property described in sec. 367(d)(4) Date of transfer description of transfer (see instructions) Description of property described in sec. 367(d)(4)	Section C — Intan	gible Property S	Subject to Section 367(d)			
n sec. 367(d)(4)		(a) Date of transfer	(b) Description of property	(c) (c) Useful Arm's len on date o	gth price f transfer Cost or other I	oasis for year of transfer
Totals	Property described in sec. 367(d)(4)					
	Totals					F 006 /D +4 0010

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14a b c	reasonably anti- At the time of the Did the transfer 1.367(d)-1(c)(3)(If the answer to to the intangible	cipated to exceed 2 he transfer, did any eror choose to ap (ii) for any intangible b line 14c is "Yes." e	O years?	t the time of the transfer, had e property have an indefinite use period provided under Regula ticipated income or cost reductions se(s) beyond the 20-year period	 eful life? ations se on attribu	ection	☐ Yes		No
15	Was any intang	ible property transfe	erred considered or anticip	ated to be, at the time of the tra ons section 1.482-7(c)(1)?	nsfer or a	at any	☐ Yes		No
Supp	olemental Part	III Information Re	equired To Be Reporte	d (see instructions)					
Dow		ol information De	secution Transfer of Dr	reporty (see instructions)					
Part 16 17 18 a b c d 19 20a b	Enter the transfe (a) Before LESS 1 Type of nonrecollected whethe Gain recognition Gain recognition Recapture unde Exchange gain to Did this transfer Did a domestic of If "Yes," comple Enter the total and	eror's interest in the THAN 5% (b) After LE ognition transaction er any transfer report under section 904 er section 1503(d) under section 987 result from a change corporation make a sete lines 20b and 20 emount of gain or los	transferee foreign corporates THAN 5% (see instructions) IRC 38 ted in Part III is subject to a (f)(3)	any of the following.		· · · · · · · · · · · · · · · · · · ·	 ☐ Yes ☐ Yes ☐ Yes ☐ Yes 		No No No No
c 21	property was us	sed in the conduct o	f U.S. trade or business ur	on the distribution of property nder Regulations section 1.367(e n of stock in a foreign controlle)-2(b)(2)?		☐ Yes	□ I	No
							☐ Yes m 926 (F		

(Rev. November 2018) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

► Go to www.irs.gov/Form926 for instructions and the latest information. ▶ Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)					
Name o	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST I	Identifying number (see instructions) 59-6150746				
1 2 a b	If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?					
_						
	Controlling shareholder	lde	ntifying number			
-						
С	If the transferor was a member of an affiliated group fili corporation?	ng a consolidated return,	, was it the parent			
	If not, list the name and employer identification number (EIN)	of the parent corporation.				
	Name of parent corporation	EIN of parent corporation				
d	Have basis adjustments under section 367(a)(4) been made?	Last tipe that the tipe tipe the tipe that	Yes 🗌 No			
3	complete questions 3a through 3d.					
a	Name of partnership	EIN	l of partnership			
TIFF	DIVERSIFYING STRATEGIES FUND, LP	83-2530183				
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?						
Part		e instructions)				
4 R/	Name of transferee (foreign corporation) ADCLIFFE INTERNATIONAL SPAC FUND LTD	5a Identifying number, if any FOREIGNUS				
6	Address (including country)	5b Reference ID number				
LANDMARK SQUARE 1ST FL PO BOX 715 GRAND CAYMON CAYMAN ISLANDS KY1-1107			(see instructions) TIFF3			
7	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
8 COI	Foreign law characterization (see instructions) RPORATION					
9	Is the transferee foreign corporation a controlled foreign corp	oration?	Yes 🗹 No			

THE 3

Type of	(a)	(b) Description of	(c)	(d)	(e) Gain recognized on
property	Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	transfer
ash	VARIOUS		144,410		
If "Yes," sl	kip the remainder of	transferred?			🛭 Yes 🗌 N
ection B-Othe	er Property (other	than intangible property			
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
tock and ecurities					
ventory					
ther property					-
ot listed under					
other category)					
operty with rilt-in loss					
III III 1000					
tals					
foreign cor If "Yes," go	poration? o to line 12b.	branch (including a branch		ded entity) transferred	ltoa <mark>∐Yes ☑ N</mark> e
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 3 Did the trans	poration?		red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehown of the action o	ded entity) transferred assets of a foreign bra foreign corporation? der with respect to	I to a ☐ Yes ☑ No anch ☐ Yes ☐ No the ☐ Yes ☐ No
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski	poration?	ic corporation that transfer foreign disregarded entity) the original disregarded entity) the firm of	red substantially all of the a o a specified 10%-owned 12d, and go to line 13. rporation a U.S. shareho	ded entity) transferred assets of a foreign bra foreign corporation? der with respect to	I to a Yes ✓ N anch Yes . No the Yes . No
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski	poration?	ic corporation that transfer foreign disregarded entity) to If "No," skip lines 12c and fer, was the domestic co n?	red substantially all of the a o a specified 10%-owned 12d, and go to line 13. rporation a U.S. shareho	ded entity) transferred	I to a Yes ✓ N anch Yes . No the Yes . No
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C—Intan	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes No anch Yes No the Yes No Yes No Income inclusion for year of transfer
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes V N anch Yes N the Yes N The the N The t
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C—Intan	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes V N anch Yes N the Yes N The the N The t
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C — Intan Type of property	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes V N anch Yes N the Yes N The the N The t
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C — Intan Type of property	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes V N anch Yes N the Yes N The the N The t
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C — Intan Type of property	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes V N anch Yes N the Yes N Income inclusion for year of transfer
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C—Intan	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes No anch Yes No the Yes No Yes No Income inclusion for year of transfer
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski ction C — Intan Type of property	poration?	ic corporation that transfer foreign disregarded entity) to lf "No," skip lines 12c and fer, was the domestic con?	red substantially all of the action of a specified 10%-owned 12d, and go to line 13. reporation a U.S. sharehoto	ded entity) transferred	to a Yes V N anch Yes N the Yes N The Yes N The Yes N Income inclusion for year of transfer

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14a b c d	reasonably antic At the time of the Did the transfer 1.367(d)-1(c)(3)(ii If the answer to I to the intangible Regulations sect Was any intangib	ror transfer any intangible property that, ipated to exceed 20 years? e transfer, did any of the transferred intang ror choose to apply the 20-year inclusi i) for any intangible property? line 14c is "Yes," enter the total estimated property's, or properties', as applicable, ion 1.367(d)-1(c)(3)(ii) \$	at the time of the transfer, had a useful life	Yes No Yes No Yes No
Supp	elemental Part II	II Information Required To Be Repor	ted (see instructions)	
			D. Market and C. Company	
Part	M Additional	I Information Regarding Transfer of	Property (see instructions)	
16	(a) Before LESS TH	ror's interest in the transferee foreign corp		
17	Type of nonrecog	gnition transaction (see instructions) ► IRC	; 351	8
18	Indicate whether	any transfer reported in Part III is subject	o any of the following.	□ Vee ☑ Ne
a			- 10 10 100 100 000	
b			Text Cast Cast Cast Cast Cast Cast Cast Cas	
d			• • • • • • • • • • • • • • • • • • •	
19	Did this transfer r	result from a change in entity classification	?	☐ Yes 🗹 No
20a			covered by section 367(e)(2)? See instructions .	
		e lines 20b and 20c.		
b		nount of gain or loss recognized pursuant		
С	property was use	ed in the conduct of U.S. trade or business	s on the distribution of property because the under Regulations section 1.367(e)-2(b)(2)?	🗌 Yes 🗹 No
21	Did a domestic of	corporation make a section 355 distribut	ion of stock in a foreign controlled corporation	

(Rev. November 2018) Department of the Treasury Internal Revenue Service

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ı Parı	U.S. Fransieror information (see instructions)		
Name o	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST	FLORIDA, INC	Identifying number (see instructions) 59-6150746
1 2	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a th	ırough 2d.	
а	If the transfer was a section 361(a) or (b) transfer, was the five or fewer domestic corporations?	transferor controlled (unde	er section 368(c)) by
b	Did the transferor remain in existence after the transfer?		
D	If not, list the controlling shareholder(s) and their identifying r		
	Controlling shareholder	lde	ntifying number
С	If the transferor was a member of an affiliated group fill corporation?	ing a consolidated return,	was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?		Yes . No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	e actual transferor (but is n	not treated as such under section 367)
a	List the name and EIN of the transferor's partnership.	T T	
	Name of partnership	EIN	l of partnership
TIFF	DIVERSIFYING STRATEGIES FUND, LP	83-2530183	
b	Did the partner pick up its pro rata share of gain on the trans		
C	Is the partner disposing of its entire interest in the partnerships the partner disposing of an interest in a limited partners	IP?	
d	securities market?		
Part	Name of transferee (foreign corporation)	se msu detions/	5a Identifying number, if any
4 .W	ORLD CARBON FUND		FOREIGNUS
6	Address (including country)		5b Reference ID number
2ND F	FLOOR BLOCK E IVEAGH COURT HARCOURT ROAD DUBLIN	2 IRELAND	(see instructions) TIFF4
7	Country code of country of incorporation or organization (see	e instructions)	
8 COF	Foreign law characterization (see instructions) RPORATION		
9	Is the transferee foreign corporation a controlled foreign corp	oration?	🗌 Yes 🗹 No
For Pa	perwork Reduction Act Notice, see separate instructions.	Cat. No. 16982D	Form 926 (Rev. 11-2018)

Section A—Ca		ding Transfer of Property	(see instruction	15)		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market valu date of transi		(d) Cost or other basis	(e) Gain recognized on transfer
Cash	11/02/2021	property		115,528		
10 Was cash If "Yes," s	kip the remainder	transferred? of Part III and go to Part IV.				Yes No
	er Property (other	r than intangible property s	(c)	1 307 (U))	(d)	(e)
Type of property	Date of transfer	Description of property	Fair market valu date of transf		Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals			1			
foreign coll f "Yes," g b Was the tree (including of "Yes," coll f "No," skill f "No," skill f "No," skill f "No," skill f "Yes," g	rporation?	n branch (including a branch	ed substantially a partially a particular and go to line poration a U.S. go to line 13.	Il of the asset of	ets of a foreign brign corporation? with respect to	ranch ☐ Yes ☐ No the ☐ Yes ☐ No
Section C-Intar	gible Property S	Subject to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful Arm life on ((d) n's length price date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals		THE RESERVE				E 006 /D 44 0040

c Did the domestic corporation not recognize gain or loss on the distribution of property because the

21

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

covered by section 367(e)(1)? See instructions

☐ Yes ☑ No

Form 926 (Rev. 11-2018)

orm **926**

(Rev. November 2018) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation

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 ▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)		
Name	of transferor HE COMMUNITY FOUNDATION FOR NORTHEAST I		Identifying number (see instructions) 59-6150746
1 2 a	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a th If the transfer was a section 361(a) or (b) transfer, was the	rough 2d.	
b	five or fewer domestic corporations?		∐ Yes ∐ No
	Controlling shareholder	Ide	entifying number
-			
9.			
С	If the transferor was a member of an affiliated group fill corporation?	ing a consolidated return	, was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?	g y y w	Yes No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	e actual transferor (but is r	not treated as such under section 367),
a	Name of partnership	EIN	N of partnership
PAT	RON CAPITAL V, LP	83-2530183	
b c	Did the partner pick up its pro rata share of gain on the translis the partner disposing of its entire interest in the partnershi	p?	😘 😘 😘 😘 🗌 Yes 🗹 No
d	Is the partner disposing of an interest in a limited partners securities market?		
Part		ee instructions)	41
4 P(Name of transferee (foreign corporation) C FEEDER V LP		5a Identifying number, if any FOREIGNUS
6	Address (including country)		5b Reference ID number
28-34	HILL STREET ST HELLER JERSEY JE4 8PN		(see instructions) PATRON1
7	Country code of country of incorporation or organization (see	e instructions)	
8	Foreign law characterization (see instructions)		
CO	RPORATION Is the transferee foreign corporation a controlled foreign corp		· · · · · . □ Yes ☑ No

		ding Transfer of Property	y (see instructions)						
Section A—Ca		(b)	(c)	(d)	(e)				
Type of property	(a) Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer				
Cash	VARIOUS		140,2	42					
If "Yes," s	kip the remainder	r transferred?			🛭 Yes 🗌 No				
Section B-Othe	er Property (other	er than intangible property s	n intangible property subject to section 367(d))						
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer				
Stock and securities									
Inventory									
Other property (not listed under another category)									
Property with									
built-in loss									
Totals	HITTER III PA								
foreign con If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the tra	assets of a foreigroration?	filed?	ed substantially all of to a specified 10%-own 12d, and go to line 13 reporation a U.S. shar go to line 13.	garded entity) transferred to the assets of a foreign bened foreign corporation? eholder with respect to the section 91	ranch o the Yes No				
Section C - Intan	gible Property S	Subject to Section 367(d)							
Type of property	(a) Date of transfer	(b) Description of property	(c) (d Useful Arm's len life on date o	gth price f transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)				
Property described n sec. 367(d)(4)									
Totals									
			-14		E 026 /D 11 0010				

0	
Take	on

	reasonably anticipated to exceed 20 years?
b	
	1.367(d)-1(c)(3)(ii) for any intangible property?
d	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?
Supp	plemental Part III Information Required To Be Reported (see instructions)
Oupp	Notifical Factor in Community Commun
-	
D - 4	IV Additional Information Regarding Transfer of Property (see instructions)
Part	Additional information Regarding Transfer of Property (see instructions)
40	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
16	
	(a) Before LESS THAN 5% (b) After LESS THAN 5%
17	Type of nonrecognition transaction (see instructions) ► IRC 351
18	Indicate whether any transfer reported in Part III is subject to any of the following.
а	Gain recognition under section 904(f)(3)
b	Gain recognition under section 904(f)(5)(F)
С	Recapture under section 1503(d)
d	Exchange gain under section 987
19	Did this transfer result from a change in entity classification?
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . Yes No
	If "Yes," complete lines 20b and 20c.
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$
	Did the domestic corporation not recognize gain or loss on the distribution of property because the
С	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
	covered by section 367(e)(1)? See instructions
	Form 926 (Rev. 11-2018

Department of the Treasury

Internal Revenue Service

Return of U.S. Persons With Respect to **Certain Foreign Partnerships**

Attach to your tax return.

Go to www.irs.gov/Form8865 for instructions and the latest information. Information furnished for the foreign partnership's tax year 1/1/2022 , 2023, and ending 12/31/2022

beginning 1/1/2022

OMB No. 1545-1668

Sequence No. 865

Attachment

3 2022

Filer's identification number Name of person filing this return 59-6150746 THE COMMUNITY FOUNDATION FOR NORTHEAST FLORIDA, INC A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): Filer's address (if you aren't filing this form with your tax return) 3 🖳 4 1 □ 2 □ 245 RIVERSIDE AVE, SUITE 310 22 , and ending DEC 31 . 20 22 JACKSONVILLE, FLORIDA 32202 B Filer's tax year beginning JAN 1 , 20 Other \$ Qualified nonrecourse financing \$ Filer's share of liabilities: Nonrecourse \$ If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions E F Information about certain other partners (see instructions) (4) Check applicable box(es) (2) Address (3) Identification number (1) Name Category 2 Constructive owner 2(a) EIN (if any) Name and address of foreign partnership 98-1571737 BARKER AIV-I LP 2(b) Reference ID number (see instructions) 2F LANDMARK SQUARE, 64 EARTH CLOSE, SEVEN MILE BARKER1 BEACH, GRAND CAYMAN CJ KY1-1201, CAYMAN ISLANDS 3 Country under whose laws organized CAYMAN ISLANDS 7 Principal business 8a Functional currency 8b Exchange rate 5 Principal place of 6 Principal business Date of organization activity code number activity (see instructions) INVESTMENT 523900 USD 1.0 **CAYMAN ISLANDS** UNKNOWN Provide the following information for the foreign partnership's tax year: Name, address, and identification number of agent (if any) in the 2 Check if the foreign partnership must file: ☐ Form 8804 **United States** ✓ Form 1065 Form 1042 Service Center where Form 1065 is filed: 4 Name and address of person(s) with custody of the books and records of the Name and address of foreign partnership's agent in country of foreign partnership, and the location of such books and records, if different organization, if any During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not Yes V No If "Yes," enter the total amount of the disallowed deductions Yes Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? 6 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities R (FDEs) and Foreign Branches (FBs), attached to this return. See instructions How is this partnership classified under the law of the country in which it's organized? . . LIMITED PARTNERSHIP 9 Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. ☐ Yes ☐ No 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. If "Yes," don't complete Schedules L, M-1, and M-2.

Form 8865 (2023)	596150746			E	Barker	/	Page 2
12a Is the fi	ler of this Form 8865 claiming a fore to any transaction with the foreign parti	ign-derived intang nership? If "Yes," o	ible income (FDII) de complete lines 12b, 12	duction (under se c, and 12d. See in	ction 250) wi structions .	th . 🗌 Yes	☐ No
b Enter the included	e amount of gross receipts derived from its computation of foreign-derived d	om all sales of ge leduction eligible ir	neral property to the come (FDDEI)	foreign partnersh	ip that the fil	er ·	
	e amount of gross receipts derived fro	m all sales of inta		foreign partnersh	nip that the fil	er •	
	e amount of gross receipts derived from			rtnership that the	filer included	in ·	
the partr	e number of foreign partners subject to nership or of receiving a distribution fro	m the partnership					
14 At any ti requirem	ime during the tax year were any trans nents of Regulations section 1.707-8?.	sfers between the	partnership and its p	artners subject to	the disclosu	re . 🗌 Yes	□No
if You're Filing This Form Separately and	Under penalties of perjury, I declare that I hav and belief, it is true, correct, and complete. D information of which preparer has any knowle	eclaration of preparer	n, including accompanyir (other than general partr	ng schedules and sta ner or limited liability	tements, and to company memi	the best of per) is based	my knowledge on all
Not With Your Tax Return.	Signature of general partner or limited liability	company member		Date			
Paid	rint/Type preparer's name	Preparer's signatur	е	Date	Check self-emp		
Preparer	irm's name				Firm's E	N	
Use Univ —	irm's address				Phone n	o.	
	interest you constructively of a			a constructive inte		Check if foreign	Check if direct
						person	partner
Schedule A-	1 Certain Partners of Foreig	n Partnershin	(see instructions)				
Scriedule A-	Name		ddress		ion number (if a	ıny)	Check if foreign person
Schedule A-	2 Foreign Partners of Section	n 721(c) Partn	ership (see instru	ictions)			
Name of foreign partner	Address	Country of organization (if any)	U.S. taxpayer identification number (if any)	Check if related to U.S. transferor	Perc Capital	entage intere	st Profits
						%	% %
Does the partn	ership have any other foreign perso	n as a direct par	tner?			. 🗌 Yes	☐ No
Schedule A-		all partnerships	(foreign or dome:	stic) in which t	ne foreign	oartnersh	ip owns a
	Name		ddress	EIN (if any)		l ordinary me or loss	Check if foreign partnership
						Form	8865 (2023)

(Rev. October 2021)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

▶ Attach to Form 8865. See the Instructions for Form 8865.

Department of the Treasi Internal Revenue Service			n to Form 8865. See i s.gov/Form8865 for i			ation.	
Name of transferor		NATION FOR	NODILIEGI EL	ODIDA INC		Filer's identifying number 59-6150746	mber
		DATION FOR	NORTHEST FL	ORIDA, INC.		Reference ID numbe	r (see instructions)
Name of foreign partners BARKER AIV-I				98-1571737		BARKER1	1 (See man denote)
1a Is the partn instructions b If "Yes," was 2 Was any int	ership a sec	erral method apperty transferred	tnership (as defined	d in Regulations cognition of gain up	 oon the contrib ne time of the	oution of property? transfer or at any	☐ Yes ☐ No
		ble Under Sec					
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery per	iod Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	6/30/2022		462,780	ALC: VIEW I	N HEV.		
Stock, notes receivable and payable, and other securities Inventory							
involtory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			462,780				
3 Enter the tra			st in the partnership eported (see instru		insfer <5	% (b) After the	transfer <5 %
			· 				
Part II Dispos	sitions Repo	table Under S	ection 6038B			·	
(a) Type of property	(b) Date of original transfe	(c) Date of r disposition	(d) Manner of disposition	(e) Gain recognized by partnership	Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
			chedule subject to		under section	on 904(f)(3) or ►	☐ Yes 🗹 No

Department of the Treasury

Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Go to www.irs.gov/Form8865 for instructions and the latest information. Information furnished for the foreign partnership's tax year nning 1/1/2022 , 2023, and ending 12/31/2022 , 20

beginning 1/1/2022

OMB No. 1545-1668

							Fi	ler's identi	fication	numk	ner						
	of person filing this retu		SD NO	THEAST ELOP	IDA INC	.		59-6150									
	COMMUNITY FO				A Coton			see Catego		Filore	in the in	etructio	ne and	check an	nlica	ble bo	x(es)).
Filer's	address (if you aren't fi	ling this form with y	your tax r	eturn)	A Categ	_		see Catego	3 🔽	rii ei s	4 🗌	Structio	iis ailu	crieck ap	plica	DIC DO	х(оз)).
	RIVERSIDE A						_		JAN 1	2		and	ending	DEC	31	. 20	22
	KSONVILLE, F				B Filer's tax year beginning JAN 1 , 20 22 , and ending DEC 31 , 20 2 Qualified nonrecourse financing \$ Other \$												
С	Filer's share of liab	ilities: Nonrecour	se \$							ut the	noron		ZiriCi Q				
D	If filer is a member	of a consolidated	d group	but not the parent	, enter the	TOllOW	ıı ıç			ut un	paren				_		
	Name						_	EIN							_		
	Address					11.2. 7.	_	One heat		_		_			_		
E	Check if any excep				ported or	this to	orm	i. See inst	ruction	S		0.10			-	•	
F	Information about of	ertain other part	ners (se	e instructions)		_						(4) Ch	ook oo	plicable b	202/0	c)	
	(1) Name (2) Addre			s			(3) Identifica	ation nu	mber	Cataa		_	egory 2	_	tructive	OWNOR	
						+				Categ	Ory I	Call	gory z	Cons	WUCHVE	OWITE	
							+						-				_
						_	+								L-	-	
	Name and address						1	2(a) EIN (i 98-15		50							
BE	SSEMER VEN	TURE PART	NERS	XI INSTITUTI	IONAL	L.P.	-			_	, ,				_	-	
MAPLES CORPORATE SERVICES LIMITED, POUGLAND HOUSE, GRAND CAYMAN, CAYMAN I			BOX 30 SLANDS)9 S		2(b) Refer BESSI			nber (se	e inst	ruction	15)					
	KY1-1104						3 Country CAYN	under	whos SLA	se laws NDS	organ	ized					
4	Date of organization	5 Principal pla- business	ce of	6 Principal busin activity code n			Principal business activity			8a Fu	la Functional currency			8b Exchange rate (see instructions			
	1/29/2016	CAYMAN ISLA	NDS	523900		INVES	IVESTMENT USD 1.0					1.0					
Н	Provide the following	ng information fo	r the for	eign partnership's	tax year:												
1	Name, address, and United States					[Ser	eck if the f Form 104 vice Center	2 [r where	Form	m 8804 1065 is f	iled:] Form				411
3	Name and address organization, if any					f	ore	ne and addi sign partner	ship, ar	nd the	location	of suc	h book	s and rec	d red ords	oras o	of the
5	allowed under sec	tion 267A? See	instructi	nership pay or ac ons						300	(4)	(e); (e);	90 90	☐ Ye \$	s	☑ N	0
_	in tes, enter the	a section 721(a)	nartner	ship, as defined in	Regulation	ns sect	tio	1.721(c)	-1(b)(14	1)?				Ye	 S	∠ N	0
6				foreign partnership						200	201 201	car oar		☐ Ye	s	☑ N	0
7	Were any special		Inform	nation Return of U													
8	(EDEa) and Eareign	n Branchae (FRe	, mon) attach	ed to this return.	See instru	ctions									()	
	(FDES) and rolleigh	rehin classified (inder th	e law of the countr	v in which	it's or	aa	nized?		LIN	/IITED	PART	TNER	SHIP			
9									گاند داند								
10a	separate unit unde 1.1503(d)-1(b)(4)(ii	er Regulations so)? If "No," skip q	ection 1 uestion	gn partnership, or a .1503(d)-1(b)(4) or 10b	part of a	combir	nec	d separate · · ·	unit u	nder 	Regulat	ions s	ection	_	s	V N	o
b		1(b)(5)(ii)?				conso	lid	ated loss,	as def	ined i	n Regul	lations	(#C (#)	☐ Ye	s	□ N	o
11	Does this partners	ship meet both o	f the fol	lowing requiremen	ts?)							
				ax year were less		,000.				ļ						_	
	2. The value of the	partnership's to	tal asse	ts at the end of the	tax year	was les	ss 1	than \$1 mi	illion.] .	((#)) ((#));	(140	1966 BAC	☐ Ye	s	L N	0

Form 8865 (202	3) 596150746			Brss	omur		Page 2
12a Is the	filer of this Form 8865 claiming a fore ct to any transaction with the foreign parti	ign-derived intang nership? If "Yes," o	ible income (FDII) dec complete lines 12b, 12d	duction (under sec c, and 12d. See in	ction 250) with	☐ Yes	□ No
b Enter	the amount of gross receipts derived fried in its computation of foreign-derived of	om all sales of ge leduction eligible in	neral property to the ncome (FDDEI)	foreign partnershi	p that the filer	uu=======	
c Enter	the amount of gross receipts derived fro		ngible property to the	foreign partnersh	ip that the filer		
d Enter	the amount of gross receipts derived from	m all services prov	ided to the foreign par	tnership that the t	filer included in		
13 Enter	the number of foreign partners subject to artnership or of receiving a distribution fro	section 864(c)(8) a m the partnership	s a result of transferrin	ng all or a portion o	of an interest in		
14 At any requir	y time during the tax year were any tran ements of Regulations section 1.707-8?.					☐ Yes	□ No
Sign Here Only You're Filing This Form Separately and	Under penalties of perjury, I declare that I hav and belief, it is true, correct, and complete. D information of which preparer has any knowle	eclaration of preparer	n, including accompanyir r (other than general partn	ng schedules and sta er or limited liability o	tements, and to t company membe	he best of n) is based o	ny knowledge on ali
Not With Your ax Return.	Signature of general partner or limited liability	company member		Date		10.	
Paid	Print/Type preparer's name	Preparer's signatur	e	Date	Check self-emplo		
reparer	Firm's name				Firm's EIN		
Jse Only	Firm's address A Constructive Ownership of				Phone no.		
	interest you constructively of a	own. See instru		a constructive inte		Check if	Check if
	Name	A	ddress	Identification nur	nber (if any)	foreign person	direct partner
	The state of Familia	Davido avalairo	(nee instructions)				
Schedule <i>I</i>	A-1 Certain Partners of Foreig	n Partnership	(see instructions)				Check if
	Name	A	ddress	Identificat	ion number (if any)	foreign person
				41			
Schedule /	A-2 Foreign Partners of Section	Country of	U.S. taxpayer		Daman	tana intern	
Name of foreig partner	n Address	organization (if any)	identification number (if any)	Check if related to U.S. transferor	Capital	tage interes	rofits
					9/		%
		1			9/		%
oes the par chedule A	thership have any other foreign personal Affiliation Schedule. List a	all partnerships	(foreign or domes	stic) in which th	ne foreign pa	<u> </u>	p owns a
	direct interest or indirectly o		ddress	EIN (if any)		ordinary or loss	Check if foreign partnership
							2065 (222)
						rorm (3865 (2023)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

(Rev. October 2021) Department of the Treasury Internal Revenue Service ➤ Attach to Form 8865. See the Instructions for Form 8865.

➤ Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transferor	ITY FOUND	ATION FOR	NORTHEST FL	ORIDA, INC.		Filer's Identifying nu 59-6150746	mber
Name of foreign partners BESSEMER VEN	ship			EIN (if any) 98-1578750		Reference ID number BESSEMER1	•
instructions b If "Yes," was Was any intitime thereaf	the gain defer angible proper ter, a platform	ral method appropriate transferred contribution a	tnership (as defined	ognition of gain up pated to be, at th	oon the contril	oution of property? transfer or at any	Yes No
Part I Transf	ers Reportab	le Under Sec	tion 6038B				,,
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery per	section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS	Hay 199	380,541				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals		1 = - 1 - 1 -	380,541				
3 Enter the tra	nsferor's perc	entage interes	st in the partnership	: (a) Before the tra	ınsfer <5	% (b) After the	transfer <5 %
Supplemental Info	rmation Requ	uired To Be R	eported (see instru	uctions):			
Part II Dispos	sitions Repor	table Under S	ection 6038B		r .		
(a) Type of property	(b) Date of original transfer	(c) Date of	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
Part III Is any section	transfer repo	rted on this s	schedule subject to	gain recognition	under secti	on 904(f)(3) or	☐ Yes ☑ No

Department of the Treasury

Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year 1/1/2022 , 2023, and ending 12/31/2022 beginning 1/1/2022

OMB No. 1545-1668

	of person filing this retu		Filer's identification number										
THE	COMMUNITY FO	UNDATION FOR	R NOF	RTHEAST FLOR	RIDA, INC		59-6150746						
245	address (if you aren't fi	VE, SUITE 31	0	eturn)	1 []	r (see Categories c	2	4 🔲				
JAC	KSONVILLE, F						beginning JAN		20 22	, and ending		31	, 20 22
C	Filer's share of liab	ilities: Nonrecours	e \$				ourse financing			Other	\$		
D	If filer is a member	of a consolidated	group	but not the parent	, enter the	followi		bout th	e parent				
	Name						EIN						
	Address											_	
E	Check if any excep				eported on	this for	m. See instruction	ons .	300 300				·
F	Information about of	certain other partn	ers (se	e instructions)			1			/#\ Chaak a	naliaabla l	201/0	a)
	(1) Name			(2) Addres	ss		(3) Identification	number	Catego	(4) Check a ry 1 Ca	tegory 2		tructive owner
G1	Name and address AYTON, DUBL			Y (CREDIT)	I P		2(a) EIN (if any 98-1446)						
PC	BOX 309, UGI YMAN ISLAND	LAND HOUSE	E, GR	AND CAYMA	N,		2(b) Reference	ID nu	mber (se	e instructio	ons)		
CA	YMAN ISLAND	15 KT 1-1104					3 Country und CAYMAN			organized			
4	Date of organization	5 Principal place business	e of	6 Principal busir activity code r			ncipal business ivity	8a F	unctional	currency			ge rate tructions)
	UNKNOWN CAYMAN ISLANDS 523900				,	INVES	VESTMENT USD				1.0		
Н	Provide the following										-		
1	Name, address, and United States					S	heck if the foreigner form 1042 Service Center when ame and address of	Form	rm 8804 1065 is fil	☑ Forned:		d vo.	and of the
3	Name and address organization, if any					fc	oreign partnership,	and the	e location (of such boo	ks and red	cords	, if different
5	During the tax ye allowed under sec If "Yes," enter the	tion 267A? See in	structi	ons					ne dedu	ction is no	ot . □ Ye . \$	s	☑ No
6	Is the partnership	a section 721(c) p	artners	ship, as defined in	Regulation	ns secti	ion 1.721(c)-1(b)(14)? .	al all		. Ye	s	✓ No
7	Were any special								a) at 1		. 🗌 Ye	s	☑ No
8	Enter the number (FDEs) and Foreign	of Forms 8858,	Inform	ation Return of L	J.S. Perso	ns With	n Respect to Fo	reign 	Disregard	ded Entitie	s	()
9	How is this partne	rship classified un	nder the	e law of the count	ry in which	it's org	ganized?	LI	MITED I	PARTNE	RSHIP		
10a	Does the filer have separate unit unde 1.1503(d)-1(b)(4)(ii)	e an interest in the er Regulations sec)? If "No," skip qu	e foreig ction 1 estion	n partnership, or .1503(d)-1(b)(4) or 10b	an interest part of a	indired combin	etly through the f ed separate unit	oreign under 	Regulati	ons sectio	n	95	☑ No
b	If "Yes," does the section 1.1503(d)-	separate unit or c	ombine	ed separate unit h	ave a dual	consol	idated loss, as d	efined 	in Regula	ations	. □ Ye	s	□ No
11	Does this partners)					
	1. The partnership	s total receipts fo	or the t	ax year were less	than \$250	,000.		ļ					□
	2. The value of the	e partnership's tota molete Schedules	al asse	ts at the end of the	e tax year	was les	s than \$1 million.	J .	1 841 842 2	in . 160 90		es	∐ No

-	а	α	е	4

	<u> </u>							
	respect	filer of this Form 8865 claiming a foreit to any transaction with the foreign partr	nership? If "Yes," c	omplete lines 12b, 12d	c, and 12d. See ins	tructions .	. 📙 Үе	s 🗌 No
b	Enter ti	he amount of gross receipts derived front in its computation of foreign-derived d	om all sales of ge leduction eligible in	neral property to the come (FDDEI)	foreign partnership	that the file	∍r ·	
С	Enter the	ne amount of gross receipts derived frod in its computation of FDDEI	m all sales of intar	ngible property to the	foreign partnershi			
d	Enter th	ne amount of gross receipts derived from putation of FDDEL	n all services provi	ded to the foreign par	tnership that the fi	ler included i	n •	
	the par	ne number of foreign partners subject to tnership or of receiving a distribution fro	m the partnership				•	
14	At any require	time during the tax year were any transments of Regulations section 1.707-8?.					. ∐ Ye	
Sign Here f You're I This Form Separatel	n ly and	Under penalties of perjury, I declare that I hav and belief, it is true, correct, and complete. Di information of which preparer has any knowle	eclaration of preparer	n, including accompanyir (other than general partn	ng schedules and stat er or limited liability c	ements, and to ompany memb	the best o er) is base	f my knowledge d on all
Vot With Γax Retui		Signature of general partner or limited liability	company member		Date			
Paid		Print/Type preparer's name	Preparer's signature	8	Date	Check [self-emp		N
Prepa		Firm's name			·	Firm's Ell	N	
Use C	עומע 📙	Firm's address				Phone no).	
		box b , enter the name, add interest you constructively o a Owns a direct interest	own. See instru	ctions.	a constructive inter		Check if	Check if
		Name	A	ddress	Identification num	ber (if any)	foreign person	direct partner
Sched	lule A	-1 Certain Partners of Foreig	n Partnership	(see instructions)				
		Name	А	ddress	Identification	on number (if a	ny)	Check if foreign person
Sched	lule A	-2 Foreign Partners of Section	on 721(c) Partn	ership (see instru	ictions)			
Name of			Country of organization	U.S. taxpayer identification number	Check if related to	Perce	entage inte	rest
part		Address	(if any)	(if any)	U.S. transferor	Capital		Profits
							%	%
							%	%
Does th	ne parti	nership have any other foreign perso	on as a direct par	tner?			. LYe:	
Sched	lule A	 Affiliation Schedule. List a direct interest or indirectly of 	all partnerships owns a 10% int	(foreign or domes erest.	stic) in which th	e toreign p	artners	
		Name	А	ddress	EIN (if any)		l ordinary ne or loss	Check if foreign partnership
							Forr	m 8865 (2023)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

(Rev. October 2021) Department of the Treasury Internal Revenue Service ➤ Attach to Form 8865. See the Instructions for Form 8865. ➤ Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transferor THE COMMUNI	TY FOUND	ATION FOR	NORTHEST FLO	ORIDA, INC.		59-6150746	mber
Name of foreign partners	hip			EIN (if any)		Reference ID numbe	r (see instructions)
CLAYTON, DUBL	IER, & RICE	FUND X (CREI	OIT), LP	98-1446590		CDR1	
instructions b If "Yes," was Was any inta	the gain defe angible prope ter, a platform		tnership (as defined	ognition of gain up ipated to be, at the	 oon the contrib ne time of the	oution of property? transfer or at any	☐ Yes ☐ No
Part I Transf	ers Reportar	le Under Sect			-1		(-)
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery per	Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		113,697	I Six Town!		171 - 7	
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			113,697		E PW LE		
3 Enter the tra Supplemental Info	nsferor's pero	centage interes uired To Be R	t in the partnership eported (see instru	(a) Before the tra	ansfer <5	% (b) After the	transfer <5 %
Part II Dispos	itions Repor	table Under S	ection 6038B		(f)	T	Ť
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
Part III Is any section	transfer repo	rted on this s	chedule subject to	gain recognition	under section	on 904(f)(3) or ▶	☐ Yes ☑ No

Department of the Treasury

Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Go to www.irs.gov/Form8865 for instructions and the latest information.

beginning 1/1/2022

Information furnished for the foreign partnership's tax year 1/1/2022 , 2023, and ending 12/31/2022

OMB No. 1545-1668

	of person filing this reta		Filer's identification number											
THE	COMMUNITY FO	UNDATION FO	R NO	RTHEAST FLOR	IDA, INC	;	59-61507							
	address (if you aren't fi			eturn)	_	-	r (see Categori				ns and	check ap	plical	ole box(es
	RIVERSIDE A				1 [2 🗍 3	3 🗹	4 L	<u> </u>				
JAC	CKSONVILLE, F	FLORIDA 322	02		B Filer's	tax year	beginning J	AN 1	20 22	, and	ending	DEC :	31	, 20 22
С	Filer's share of liab	ilities: Nonrecours	se \$				ourse financir				Other \$			
D	If filer is a member	of a consolidated	group	but not the parent	, enter the	followi	ng informatio	n about t	he pare	nt:				
7	Name						EIN							
	Address													
E	Check if any excep	ted specified fore	ign fina	incial assets are re	eported or	this fo	m. See instru	ctions	0.08.0	0.00	K: •			
F	Information about													
7.				(2) Addres			(3) Identificati	on numbe	r	(4) Ch	eck app	olicable b	ox(es	5)
	(1) Name			(Z) Addres			(b) Identificati	- I I I I I I I I I I I I I I I I I I I	Cate	gory 1	Cate	gory 2	Const	ructive own
G1	Name and address	of foreign partne	rship				2(a) EIN (if	any)						
	GC FUND III	.	·				98-13	19219						
W	ALKERS CORP ORGE TOWN,	ORATE LIMI	TED,	190 ELIGIN A	VE,	ı	2(b) Refere		umber (see inst	ruction	s)		
	ANDS	GRAND CAT	IVIZIN	i, KT 1-9000 O	A HVIAN	•	3 Country (ized			
4	Date of organization	5 Principal plac	e of	6 Principal busin			ncipal busines	ss 8a l	unctio	nal curre	ency	8b Exc (see		je rate ructions
			IDC			INIVES	TMENT	USE				1.0		
	UNKNOWN	CAYMAN ISLAN		523900		IIIVES	I MICIAL	031				1.0	_	
<u>H</u>	Provide the following					2.0	heck if the fo	roian par	tnerchir	muet f	ilo.		_	
1	Name, address, an United States	a identification no	mber	n agent (ii ariy) iii t		s	Form 1042 Service Center v	☐ Fow	orm 880 n 1065 is	4 🗹] Form			
3	Name and address organization, if any		rship's	agent in country o	f		ame and addre reign partnersh							
5	During the tax ye allowed under sec	ction 267A? See in	nstructi	ons					20.00	duction	is not	☐ Y e	s [☑ No
6	Is the partnership									- San - San	41.4	☐ Ye	s [∠ No
7	Were any special								1 4 4	an an	347.54	☐ Ye	s [☑ No
8	Enter the number	r of Forms 8858	Inform	ation Return of L	J.S. Perso	ns With	Respect to	Foreign	Disreg	arded E	ntities			
	(FDEs) and Foreig	n Branches (FBs).	attach	ed to this return. S	See instruc	ctions							0	
9	How is this partne	rship classified u	nder th	e law of the countr	y in which	it's org	janized? .	. L	IMITE	PART	INERS	SHIP		
	Does the filer have													
10a	separate unit und 1.1503(d)-1(b)(4)(ii	er Regulations se i)? If "No," skip qu	ction 1 estion	.1503(d)-1(b)(4) or 10b	part of a	combin	ed separate i	unit unde	r Regul	ations s	ection .	☐ Ye	s [☑ No
b	If "Yes," does the section 1.1503(d)-	separate unit or o	ombin	ed separate unit h	ave a dual · · ·	consol	idated loss, a	s defined	l in Reg	ulations	843 ·	☐ Ye	s [□ No
11	Does this partners)						
	1. The partnership					,000.		Ţ					-	_
	2. The value of the	partnership's tot	al asse	ts at the end of the	tax year	was les	s than \$1 milli	ion.		ଲୋଲୀ	(9)	Ye	s L	∐ No

Form 8865 (2023)	5 9 .	6150746			•	HGGC		Page 2
12a Is the fi	iler of this For	m 8865 claiming a forei tion with the foreign partr	gn-derived intang nership? If "Yes," o	ible income (FDII) dec complete lines 12b, 12	duction (under s c, and 12d. See i	ection 250) winstructions .	ith . Yes	No
b Enter th	ne amount of g	gross receipts derived fro ation of foreign-derived d	om all sales of ge eduction eligible ir	neral property to the acome (FDDEI)	foreign partners	hip that the fi	ler •	
c Enter th	e amount of g	ross receipts derived fro	m all sales of inta		foreign partners	hip that the fi	ler •	
d Enter th		ross receipts derived fror			rtnership that the	filer included	in	
13 Enter th	e number of fo	reign partners subject to eceiving a distribution fror	section 864(c)(8) a n the partnership	s a result of transferring			in .	
14 At any 1	time during the	e tax year were any transations section 1.707-8?.	sfers between the	partnership and its p	artners subject t	o the disclosu	re	i □ No
You're Filing his Form eparately and	and belief, it is tr	of perjury, I declare that I hav ue, correct, and complete. Do nich preparer has any knowle	eclaration of prepare	n, including accompanyir (other than general partr	ng schedules and s ner or limited liability	tatements, and to company mem	o the best of ber) is based	my knowledge on all
lot With Your ax Return.	Signature of gen	eral partner or limited liability	company member		Date			
ala	Print/Type prepar	er's name	Preparer's signatur	е	Date	Check self-em	_	
Preparer -	Firm's name					Firm's E	IN	
Jse Only 🗀	Firm's address					Phone n	0.	
		you constructively of Owns a direct interest			a constructive in		Check if foreign	Check if direct
	Ttaille						person	partner
	7	B. 1	- D- de sushim	(and instructions)				
Schedule A-	Certain	Partners of Foreig	n Partnersnip	(see instructions)	T			Check if
	Name		A	Address	Identifica	ation number (if a	any)	foreign person
chedule A-	2 Foreign	Partners of Section	n 721(c) Partr	nership (see instru	uctions)			
Name of foreign			Country of	U.S. taxpayer	Check if related to	Perc	entage intere	est
partner		Address	organization (if any)	identification number (if any)	U.S. transferor	Capital		Profits
							%	%
							%	%
oes the partr	nership have a	any other foreign perso	n as a direct pa	rtner?		1851 1858	. 🗌 Yes	
Schedule A-	3 Affiliati	on Schedule. List a	III partnerships	(foreign or dome	stic) in which	the foreign	partnersh	nip owns a
	Name			ddress	EIN (if any)		al ordinary me or loss	Check if foreign partnership
							Form	8865 (2023)

Transfer of Property to a Foreign Partnership (Under Section 6038B)

(Rev. October 2021)
Department of the Treasury
Internal Revenue Service

➤ Attach to Form 8865. See the Instructions for Form 8865.

➤ Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transferor		ATION FOR	NORTHEST FL	ORIDA INC		Filer's identifying nu 59-6150746	mber
Name of foreign partners		ATIONTON	NONTILOTTE	EIN (if any) 98-1319219		Reference ID numbe	r (see instructions)
instructions b If "Yes," was Was any into	the gain defe	erral method apporty transferred	tnership (as defined to avoid the reconsidered or anticas defined in Regula	d in Regulations cognition of gain up	 oon the contrib he time of the	(c)-1(b)(14))? See	☐ Yes ☐ No
		ble Under Sec					
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery peri	od (f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		102,421				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			102,421				
3 Enter the tra	nsferor's per	centage interes	st in the partnership	: (a) Before the tra	ansfer <5	% (b) After the	transfer <5 %
Supplemental Info	rmation Req	uired To Be R	eported (see instru	uctions):			
Part II Dispos	itions Repor	table Under S	Section 6038B				
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
			chedule subject to				☐ Yes ☑ No

Department of the Treasury

Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year 1/1/2022 , 2023, and ending 12/31/2022 , 20 beginning 1/1/2022

OMB No. 1545-1668

	COMMUNITY FO		RIDA INC		59-6150746) }							
	address (if you aren't fi				A Catego	ory of filer	(see Categories of		in the instru	ctions and	I check ap	plicab	le box(es)):
	RIVERSIDE A			Ciarry	1		2 🗍 3 🗜		4 🔲				
	CKSONVILLE, F				B Filer's	tax year k	peginning JAN	1 ,	20 22 , a	nd ending	DEC	31 ,	20 22
C	Filer's share of liab				Qualified	nonreco	ourse financing \$	3		Other	\$		
D	If filer is a member			but not the paren	t, enter the	followin	g information at	oout th	ne parent:				
-	Name						EIN						
-	Address												
E	Check if any excep	ted specified fore	eign fina	ancial assets are r	eported or	this for	m. See instruction	ons .	(6) · ·		(6) (6)		: : : ·
F	Information about	certain other parti	ners (se	e instructions)									
	(1) Name			(2) Addre	ss		(3) Identification r	number			oplicable b		
	(1) 110								Category	1 Cat	egory 2	Constr	ructive owner
												_	
												_	
G1	Name and address		rship				2(a) EIN (if any 98-12398						
	ATRON CAPITA						2(b) Reference		mbor loog i	notruotio	ne)		
28	-34 HILL STRE	ET, ST HELIE	ER, J	ERSEY JE4 8	PN		PATRON1				118)		
							3 Country under JERSEY	er who	se laws org	ganized			
4	Date of organization	5 Principal place	e of	6 Principal busing		7 Princ	cipał business /itv	8a F	unctional c	urrency	8b Exc		e rate ructions)
	-			·		INVEST	·	USD			1.0		
	1/29/2016	JERSEY	Aba fau	523900		INVES	INENI	030			1.0		
<u>H</u>	Provide the following Name, address, an					2 Ch	neck if the foreig	n part	nership mu	st file:			
1	United States	a identification no	TILIDE! (n agent (ii any) iii	ti i G				rm 8804	✓ Forn	n 1065		
						_	ervice Center wher	e Form	1065 is filed	:			
3	Name and address	of foreign partne	rship's	agent in country of	of		me and address o						
	organization, if any					for	eign partnership,	and the	e location of	such book	s and rec	ords, i	if different
5	During the tax ye	ear, did the foreig	gn part	nership pay or ac	ccrue any	interest	or royalty for w	hich t	he deducti	on is no	t	г	7.
	allowed under sec											s Ľ	∐ No
	If "Yes," enter the	total amount of t	he disa	llowed deductions	5			· :			 ☐ Ye	<u> </u>	No
6	Is the partnership)					_	No No
7	Were any special Enter the number											_	
8	Enter the number (FDEs) and Foreig											0	
9	How is this partne								MITED PA				
								oreian	nartnershir	that's	· · · · · · · · · · · · · · · · · · ·		
10a	Does the filer have separate unit und 1.1503(d)-1(b)(4)(ii	er Regulations se)? If "No," skip qu	ection 1 uestion	.1503(d)-1(b)(4) or 10b	part of a	combine 	ed separate unit	under	Regulation	s section	์ ☐ Ye	s •	☑ No
b	section 1.1503(d)-	·1(b)(5)(ii)?				consolic	dated loss, as de	efined	in Regulation	ons	☐ Ye	s [□No
11	Does this partners							1					
	1. The partnership	s total receipts f	or the t	ax year were less	than \$250	,000.		ļ				_	٦.,
	2. The value of the	partnership's tot	al asse	ts at the end of the	e tax year	was less	than \$1 million.	1.	• 6	£ 6 6	☐ Ye	s L	⊔ No
	If "Yes," don't cor	molete Schedules	L, M-1	, and M-2.									

Form 8865 (20	23) 596150746			Pa	tron	•	Page 2	
	e filer of this Form 8865 claiming a fore ect to any transaction with the foreign part					☐ Yes	☐ No	
	r the amount of gross receipts derived fr ded in its computation of foreign-derived d							
	r the amount of gross receipts derived froded in its computation of FDDEI		ngible property to the	•	that the filer			
	the amount of gross receipts derived from the thickness of the second sec							
	the number of foreign partners subject to artnership or of receiving a distribution fro							
	ny time during the tax year were any trans rements of Regulations section 1.707-8?.					☐ Yes	□ No	
Sign Here Only if You're Filing This Form Separately and Not With Your	and belief, it is true, correct, and complete. Di information of which preparer has any knowle	eclaration of preparer edge.						
Tax Return.	Signature of general partner or limited liability	company member		Date				
Paid Preparer	Print/Type preparer's name	Preparer's signatur	e	Date	Check self-employ			
Use Only	Firm's name				Firm's EIN			
OSE OIIIy	Firm's address Phone no. Phone no. Phone no.							
	box b , enter the name, add interest you constructively of a U Owns a direct interest		ctions.	a constructive intere	st	Check if	Check if	
	Name	A	ddress	Identification numb	er (if any)	foreign person	direct partner	
Schedule	A-1 Certain Partners of Foreig	n Partnership	(see instructions)	=				
	Name	А	ddress	Identification	number (if any)		Check if foreign person	
C - h l - l -	A O Familian Deutschaus of Ocation	704(-) D1-						
Schedule	A-2 Foreign Partners of Section	Country of	ersnip (see instru	ctions)				
Name of foreign	n Address	organization (if any)	U.S. taxpayer identification number (if any)	Check if related to U.S. transferor	Percent Capital	age interes	rofits	
					%		<u>%</u>	
Joon than in	es the partnership have any other foreign person as a direct partner?							
Schedule		all partnerships	(foreign or domes	stic) in which the	foreign pa	<u> Yes</u> rtnershi	p owns a	
	Name	I	ddress	EIN (if any)	Total or income		Check if foreign partnership	
			· · · · · · · · · · · · · · · · · · ·					

Form **8865** (2023)

(Rev. October 2021)
Department of the Treasury

Transfer of Property to a Foreign Partnership (Under Section 6038B)

► Attach to Form 8865. See the Instructions for Form 8865.

Go to www.irs.gov/Form8865 for instructions and the latest information.

Internal Revenue Service	1	Go to www.ir.	s.gov/rollilobos for i	nstructions and the			
Name of transferor		ATION FOR	NORTHEST FL	ORIDA, INC.		Filer's identifying nu 59-6150746	mber
Name of foreign partners	hip			EIN (if any)			er (see instructions)
1a Is the partn instructions b If "Yes," was Was any into	ership a sect the gain defe	rral method apports transferred	plied to avoid the rec considered or antic	d in Regulations cognition of gain up	 oon the contribute time of the t	c)-1(b)(14))? See 	Yes No
Part I Transf	ers Reportal	ole Under Sec	tion 6038B				
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery perio	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		134,209				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)						-	
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
 Totals			134,209				
3 Enter the tra	nsferor's per	centage interes	st in the partnership	: (a) Before the tra	ansfer <5	6 (b) After the	transfer <5 %
Part II Dispos	itions Repor	table Under S	Section 6038B				
THE COMMUNITY FOUNDATION FOR NORTHEST FLORIDA, INC. S9-1239867 Reference to number (see instruction PATRON) 1a Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-16b)(14))? See instructions. b If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property? Yes 1		Depreciation recapture allocated					
						904(f)(3) or ▶	☐ Yes ☑ No

Department of the Treasury Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year 1/1/2022 , 2023, and ending 12/31/2022 , 20

beginning 1/1/2022

OMB No. 1545-1668

	of person filing this ret	um DUNDATION FOR NO	RTHEAST FLOR	NDA INC		59-6150746		iber				
Filer's	address (if you aren't f	iling this form with your tax VE, SUITE 310			ory of filer	(see Categories o 2		in the instr	uctions and	i check a	oplica	ble box(es)
JA	CKSONVILLE, I	FLORIDA 32202				peginning JAN		20 22 ,	and ending	DEC	31	, 20 22
С		ilities: Nonrecourse \$				ourse financing \$			Other :	\$		
D	If filer is a member	of a consolidated group	but not the parent	, enter the	following		out th	e parent:				
	Name					EIN					_	
	Address											
E		oted specified foreign fin		eported or	this for	m. See instructio	ns .				•	Ц
F	Information about	certain other partners (se	ee instructions)						4) Check ar	antinoble i	hav/a	a)
	(1) Name		(2) Addres	SS		(3) Identification n	umber	Category		egory 2	1	tructive owne
G1	Name and address	of foreign partnership				2(a) EIN (if any)						
		NERS FUND III, LF				98-14870						
		ORPORATE LIMIT GRAND CAYMAN				2(b) Reference UNICORN	[[]			nsj		
IS	LANDS		40			3 Country under CAYMAN	ISLA	NDS				
4	Date of organization	5 Principal place of business	6 Principal busin activity code n			Principal business activity 8a Functional cu			currency	urrency 8b Exchange (see instru		
	UNKNOWN	CAYMAN ISLANDS	523900		INVES	IMENT		1.0				
н	Provide the following	ng information for the for	eign partnership's	tax year:								
1	United States	d identification number			Se	ervice Center where	Form	rm 8804 1065 is filed	☑ Forn d:		al va a	
3	organization, if any				for	me and address of eign partnership, a	and the	location of	such book	s and red		
5	allowed under sec	ear, did the foreign part ction 267A? See instruct total amount of the disa	ons				. (4)	* *		⊔ Ye	es [☑ No
6	Is the partnership	a section 721(c) partner	ship, as defined in	Regulation	ns sectio	on 1.721(c)-1(b)(1	4)? 🙊	* * *	96	☐ Ye	s [∠ No
7	Were any special	allocations made by the	foreign partnership	?			. 8	x=x=x	9 9	☐ Ye	s [✓ No
8	(FDEs) and Foreig	r of Forms 8858, Inform n Branches (FBs), attach	ned to this return. S	See instruc	ctions						0	
9	How is this partne	rship classified under th	e law of the countr	y in which	it's orga	anized?	LIN	MITED PA	ARTNER	SHIP		
10a	separate unit unde 1.1503(d)-1(b)(4)(ii	e an interest in the foreiq er Regulations section 1)? If "No," skip question	.1503(d)-1(b)(4) or 10b	part of a	combine · ·	d separate unit	under 	Regulation	ns section	1	s [☑ No
b	section 1.1503(d)-	separate unit or combin 1(b)(5)(ii)?			consolic	dated loss, as de	fined i	in Regulati	ons	☐ Ye	s [] No
11		ship meet both of the fol)					
		's total receipts for the t					}				_ [¬ м
		partnership's total asse		tax year v	was less	than \$1 million.] .	* * *	W W W	∐ Ye	:S L	_ No

						*		
Form 8865	(2023)	596150741	0		L	nicorn	Ш	Page 2
12a Is	the f	iler of this Form 8865 claiming a fore to any transaction with the foreign parti	ign-derived intangi nership? If "Yes," o	ible income (FDII) dec complete lines 125, 126	duction (under s c, and 12d. See	ection 250) winstructions .	/ith . ☐ Ye :	s 🗌 No
b Er	nter th	ne amount of gross receipts derived fr d in its computation of foreign-derived d	om all sales of ge leduction eligible in	neral property to the acome (FDDEI)	foreign partners	hip that the f	íler ·	
		ne amount of gross receipts derived frod in its computation of FDDEI	m all sales of inta	ngible property to the	foreign partners	ship that the f	iler •	
		e amount of gross receipts derived from	m all services prov	ided to the foreign par	tnership that the	e filer included	in •	
13 Er	nter th	e number of foreign partners subject to nership or of receiving a distribution fro	section 864(c)(8) a m the partnership	s a result of transferrin	ng all or a portion	of an interest	t in 	
14 At	t any tequirer	time during the tax year were any trannents of Regulations section 1.707-8?.	sfers between the	partnership and its p	artners subject t	to the disclosi	ıre . ∐Ye:	s 🗌 No
Sign Here O if You're Fili This Form Separately a	ing and	Under penalties of perjury, I declare that I hav and belief, it is true, correct, and complete. D information of which preparer has any knowle	eclaration of preparer	n, including accompanyir (other than general partn	ng schedules and s er or limited liabilit	tatements, and to company men	to the best of iber) is based	' my knowledge d on all
Not With Yo Tax Return.		Signature of general partner or limited liability	company member		Date	9		
Paid	- 1	Print/Type preparer's name	Preparer's signatur	e	Date	Check self-em	_	\
Prepare		Firm's name	1/			Firm's E	EIN	
Use On	ııy 📙	Firm's address				Phone i	10.	
Schedu		box b, enter the name, add interest you constructively of a	ress, and U.S.	taxpayer identific ctions.	ation number a constructive in	(if any) of t	he perso	n(s) whose
		Name	A	ddress	Identification n	umber (if any)	Check if foreign person	Check if direct partner
								-
Calcada	to A	1 Certain Partners of Foreig	n Portnorchin	(eas instructions)				
Schedu	ile A	Name		ddress	Identific	ation number (if	any)	Check if foreign person
Schedu	lo A-	2 Foreign Partners of Section	n 721(c) Partn	ershin (see instru	uctions)			
Name of fo		7 Oreign Farthers of ocode	Country of	U.S. taxpayer	Check if related to	Per	centage inter	est
partne	•	Address	organization (if any)	identification number (if any)	U.S. transferor	Capital		Profits
							%	%
							%	%
Does the	partr	nership have any other foreign perso	on as a direct par	rtner?	· · · ·		. 🗌 Yes	
Schedu			all partnerships	(foreign or domes	stic) in which	the foreign	partners	
		Name	А	ddress	EIN (if any)		tal ordinary ome or loss	Check if foreign partnership
SEE ST	TATE	EMENT						

Form **8865** (2023)

(Rev. October 2021) Department of the Treasury Internal Revenue Service

Transfer of Property to a Foreign Partnership (Under Section 6038B)

➤ Attach to Form 8865. See the Instructions for Form 8865. ➤ Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transferor THE COMMUN	ITY FOUND	ATION FOR	NORTHEST FL	ORIDA, INC.		Filer's identifying nu 59-6150746	mber
Name of foreign partners UNICORN PARTN	ship			EIN (if any) 98-1487008		Reference ID numbe	er (see instructions)
1a Is the partn instructions b If "Yes," was Was any int	ership a sectors the gain defe	tion 721(c) par erral method ap erty transferred	tnership (as defined in the considered or anticed as defined in Regula	d in Regulations cognition of gain up	 pon the contrib he time of the		☐ Yes ☑ No ? ☐ Yes ☐ No
		ole Under Sec					
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery perio	od Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		485,214				
Stock, notes receivable and payable, and other securities							
inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			485,214				
3 Enter the tra Supplemental Info	nsferor's pero	centage interes	et in the partnership eported (see instru	(a) Before the tra	ansfer <5	% (b) After the	transfer <5 %
Part II Dispos	itions Repor	table Under S	ection 6038B				
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
Part III Is any section	transfer repo 904(f)(5)(F)?	rted on this s	chedule subject to	gain recognition	under section	n 904(f)(3) or ▶	☐ Yes ☑ No

Form 8865 Information Statement: Return of U.S. Persons With Respect to Certain Foreign Partnerships

The information below is being provided to assist you with the preparation of Form 8865, if required. Please consult your tax advisor to determine if you need to file the form.

Information on Pages One and Two of Form 8865

Name of Foreign Partnership:

Unicorn Partners Fund III, L.P.

Address of Foreign Partnership:

Unit 2502, One Hennessy

1 Hennessy Road

Wan Chai Hong Kong

EIN: 98-1487008

Country Under Whose Laws Organized: Cayman Islands
Date of Organization: February 8, 2019
Principal Place of Business: Cayman Islands

Principal Business Activity Code Number: 523900
Principal Business Activity: Investment
Functional Currency: US Dollar

Exchange Rate: N/A
Name and Address of Foreign Partnership's N/A

Agent in The U.S., If Any:

Foreign Partnership Must File: Form 1065; Efile

Name and Address of Foreign Partnership's Agent in Country of Organization, if Any:

Name and Address of Person with Custody

of Books and Records, if Different:

IQ EQ Fund Services (Hong Kong) Ltd.

Unit 605-07, Wing On Centre 111 Connaught Road Central

Hong Kong

N/A

Item H5NoItem H6NoItem H7Yes

Item H9 Exempted Limited Partnership

Item H12aNoItem H13NoneItem H14No

Schedule A-1 - Certain Partners of Foreign Partnership

No U.S. person owned a 10% or greater direct interest in the foreign partnership.

Schedule A-3 - Affiliation Schedule

Name	Address	EIN	Foreign
01VC Fund I, L.P.	Walkers Corporate Limited, 190 Elgin Avenue, George Town, Grand Cayman, Cayman Islands KY1-9008	98-1486067	Х
5Y Capital Evolution Fund II, L.P.	C/O 5Y Capital Gp Limited Central, Hong Kong	98-1598026	Х
5Y Capital Growth Fund I, L.P.	C/O 5Y Capital Gp Limited Central, Hong Kong	98-1598041	Х
Banyan Partners Fund III-A, L.P.	Walkers Corporate Limited, 190 Elgin Avenue, George Town, Grand Cayman, Cayman Islands KY1-9008	N/A	Х
Blue Lake Capital Fund III, L.P.	C/O Blue Lake Capital, Suite 2703 Shanghai, China 200023	98-1545450	Х
Cenova China Healthcare Fund V, L.P.	53 Gao You Road, Xuhui District Shanghai, China 200031	98-1684439	Х
Cherubic Ventures Fund V, L.P.	1F, No.56, Ln 122, Sec 4, Ren' Ai Rd, Taipei City, Taiwan	98-1674147	Х
Core Investment Holdings Ltd	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1595361	Х
Decheng Capital Global Life Sciences Fund IV, L.P.	P.O. Box 309, George Town Grand Cayman, Cayman Islands KY1-1104	98-1568621	Х
Eminence China Enterprise Fund II, LP	Ste 503, Bldg 16, No. 1036, Tianlin Rd, Shanghai, China	98-1593215	Х
Future Capital Discovery Fund IV, L.P.	86/F International Commerce Centre,1 Austin Road West, Kowloon Hong Kong	98-1540773	X
Future Capital Select Fund Zero, L.P.	86/F International Commerce Centre,1 Austin Road West, Kowloon Hong Kong	98-1584372	X
Gaorong Partners Fund V, L.P.	Walkers Corporate Limited, 190 Elgin Avenue, George Town, Cayman Islands KY1-9008	98-1559805	X

GGV Discovery III, L.P.	3000 Sand Hill Road, Bldg 4, Suite	98-1561085	Х
Ibex Venture Limited	230, Menlo Park, CA 94025 Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1583805	X
INCE Capital Partners, L.P.	C/O Walkers Corporate Limited, 190 Elgin Ave, George Town Grand Cayman, Cayman Islands KY1-9008	98-1520217	X
Linear Capital IV L.P.	5th Floor Block E, No.381 Panyu Road, Shanghai, China 200052	98-1595126	X
M31 Navigator Fund LP	Maples Corporate Services Ltd, PO Box 309, Grand Cayman, Cayman Islands KY1-1104	98-1533081	Х
Markhor Ventures Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1584009	Х
Matrix Partners China VI, L.P.	PO Box 309, Ugland House South Church Street, George Town, Grand Cayman, Cayman Islands KY1-1104	98-1540788	Х
Osiris Ventures Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1584105	Х
Rare Peak Investment L.P.	4th Floor, Harbour Place, 103 South Church Street, P.O. Box 10240, Grand Cayman, Cayman Islands KY1-1002	N/A	Х
Sekhmet Ventures Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1659026	Х
Source Code Growth Fund II L.P.	C/O Harneys Fiduciary (Cayman) Limited, George Town, P.O. Box 10240, Cayman Islands KY1-1002	98-1668089	Х
Source Code Venture Fund V L.P.	C/O Harneys Fiduciary (Cayman) Limited, George Town, P.O. Box 10240, Cayman Islands KY1-1002	98-1667900	Х
Tekton SPV II, LLC	1209 Orange Street Wilmington , Delaware 19801	85-3454358	
Unicorn Horus Ventures Holdings Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1658457	X
Vision Plus Capital Fund III, L.P.	C/O Maples Corporate Services Limited, Ugland House, Grand Cayman, Cayman Islands KY1-1104	98-1548218	Χ

596150746

Vision Plus Capital Growth Fund I, L.P.	C/O Maples Corporate Services Limited, Ugland House, Cayman Islands KY1-1104	98-1548220	Х
VP Top LP	Kingston Chambers, Po Box 173 Road Town, Tortola, British Virgin Islands	98-1591854	Χ

1

¥

Department of the Treasury Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Go to www.irs.gov/Form8865 for instructions and the latest information.

Information furnished for the foreign partnership's tax year 1/1/2022 , 2023, and ending 12/31/2022 ,

beginning 1/1/2022

OMB No. 1545-1668

Name of person filing this return THE COMMUNITY FOUNDATION FOR NORTHEAST FLORIDA, INC						59-6150746							
		iling this form with your ta				(see Categories of		in the instruct	ions and	l check ar	plica	ble box(e	-s))
		VE, SUITE 310	roturn,	1 [_	2 3		4 🔲				,	
		FLORIDA 32202		B Filer's	tax year	beginning JAN	1 ,:	20 22 , an	d ending	DEC	31	, 20 2	2
C		pilities: Nonrecourse \$		-		ourse financing \$	3		Other	\$			
D		of a consolidated grou	p but not the paren	t, enter the	e fallowir	ng information at	oout th	e parent:					
	Name					EIN							
	Address												_
E	Check if any excep	oted specified foreign fi	nancial assets are r	eported or	this for	m. See instruction	ons .		,	* *	*	2 2	_
F	Information about	certain other partners (see instructions)					143.4			,	,	_
	(1) Name		(2) Addre	ss		(3) Identification r	number			oplicable l egory 2	·	tructive ow	· no
								Category 1	Car	egory z	COH	tructive ov	1110
_							-		+-		-		- 7
G1	Nome and address	of foreign partnership				2(a) EIN (if any)		-				
		NERS FUND IV, L	D			98-15997							
		ORPORATE LIM		IN AVE		2(b) Reference	ID nu	mber (see in:	structio	ns)			
		GRAND CAYMA				UNICORN	IV						
	LANDS	, • • • • • • • • • • • • • • • • • • •				3 Country und	er who	se laws orga	ınized				
			-			CAYMAN							_
4	Date of	5 Principal place of business	6 Principal busing activity code r		7 Prin	cipal business	8a Fi	unctional cur	rency	8b Exc		ge rate truction	s)
	organization						ucn			,			-,
	UNKNOWN	CAYMAN ISLANDS	523900		INVES	TMENT	USD			1.0			_
H 1		ng information for the food id identification number			2 C	neck if the foreig	n nartr	nership must	file:				_
'	United States	d Identification number	or agent (it arry) in	u io		_			✓ Forn	n 1065			
					Se	ervice Center when	— e Form		_				
3		of foreign partnership	s agent in country o	of		me and address of							
	organization, if any				for	eign partnership, a	and the	location of su	ch book	s and rec	ords	if differe	ent
													-
5		ear, did the foreign pa		crue any	interest	or royalty for w					ا ہ	✓ No	
		ction 267A? See instruct total amount of the dis								\$	5 I	· NO	
6	It Tes, enter the	a section 721(c) partne	rshin as defined in	, Begulatio	ns sectio	n 1.721(c)-1(b)(4)?			<u> </u>	s	Z No	
7	•	allocations made by the			, ,					☐ Ye		☑ No	
8		of Forms 8858, Infor			ns With	Respect to For	reign [Disregarded	Entities	i			
•		n Branches (FBs), attac									C		
9	How is this partne	ership classified under t	he law of the count	ry in which	it's orga	anized?	LIN	MITED PAF	TNER	SHIP			
10a	Does the filer have	e an interest in the fore	ign partnership, or	an interest	indirect	ly through the fo	reign	partnership,	that's a	l.			
	separate unit unde	er Regulations section	1.1503(d)-1(b)(4) or	part of a	combine	d separate unit	under	Regulations	section			- 1	
)? If "No," skip question								∐ Ye	s [<u>⊾</u> No	
b	If "Yes," does the	separate unit or combi	ned separate unit h	ave a dual	consoli	dated loss, as de	fined i	n Regulation	S	☐ Ye	_ [No	
4.0		1(b)(5)(ii)?					1			16	ا د	40	
11		ship meet both of the fo			000		1						
		o's total receipts for the partnership's total ass				than \$1 million	}			☐ Ye	s [No	
		e partnersnip s total ass millete Schedules L. M		can year	, as 1000	CHAIT WI THINGIT.	J					_	

Form 88	65 (202	596150	746		Uni	com	IV		Page 2
12a	Is the	filer of this Form 8865 claiming a fore	ign-derived intang nership? If "Yes," o	gible income (FDII) de complete lines 12b, 12	duction (under se c, and 12d. See it	ection 250) v	with	Yes	☐ No
b	Enter includ	the amount of gross receipts derived fred in its computation of foreign-derived computation of gross receipts derived from the foreign-derived computation of gross receipts derived from the foreign-derived from the foreign-derive	om all sales of ge leduction eligible in	eneral property to the ncome (FDDEI)	foreign partnersl	nip that the	filer		
С	c Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership included in its computation of FDDEI								
d		the amount of gross receipts derived from nputation of FDDEI.	m all services prov	vided to the foreign pa	rtnership that the	filer include	d in •		
13	the pa	the number of foreign partners subject to rtnership or of receiving a distribution fro	m the partnership						
14		time during the tax year were any tran ements of Regulations section 1.707-8?.		partnership and its p	partners subject to	the disclos		Yes	□ No
Sign Hero if You're This Forr Separate Not With	Filing m ely and	Under penalties of perjury, I declare that I hav and belief, it is true, correct, and complete. D information of which preparer has any knowle	eclaration of prepare	rn, including accompanyi r (other than general parti	ng schedules and st ner or limited liability	atements, and company mer	to the bes nber) is ba	t of my sed on	r knowledge all
Tax Retu		Signature of general partner or limited liability	company member		Date				
Paid	2404	Print/Type preparer's name	Preparer's signatur	re	Date	Check if self-employed			
Prepa		Firm's name	n's name						
Use C	עוחכ	Firm's address				Phone	no.		
Schee	uule 1	Constructive Ownership of box b, enter the name, add interest you constructively of a Owns a direct interest	lress, and U.S.	taxpayer identificutions.	ation number	(if any) of	the per	son(s	s) whose
		a 🕒 Owns a direct interest		D L OWIN	T CONSTITUTE IN	Cicot	Check		Check if
		Name	A	Address	Identification nu	mber (if any)	foreig perso		direct partner
								-	
Scher	lule A	-1 Certain Partners of Foreig	n Partnership	(see instructions)					
Schedule A-1 Certain Partners of Foreign Name			Address			fany)		Check if foreign person	
								-	
Sched	lule A	-2 Foreign Partners of Section	n 721(c) Partr	nership (see instru	uctions)				
Name of foreign partner		A	Country of organization	U.S. taxpayer identification number	Check if related to	Pe	rcentage in	nterest	
		Address	(if any) (if any)		U.S. transferor	Capital		Pro	fits
						%		%	
							%		%
		nership have any other foreign perso						es	□ No
Sched	lule A	 Affiliation Schedule. List a direct interest or indirectly of 	ll partnerships wns a 10% int	(foreign or dome: erest.	stic) in which t	he foreign	partne	rship	owns a

Address

Name

SEE STATEMENT

Form **8865** (2023)

Total ordinary income or loss

EIN (if any) Check if foreign partnership

(Rev. October 2021) Department of the Treasury Internal Revenue Service

Transfer of Property to a Foreign Partnership (Under Section 6038B)

► Attach to Form 8865. See the Instructions for Form 8865.

► Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transferor THE COMMUN	IITY FOUND	DATION FOR	NORTHEST FL	ORIDA, INC.		Filer's identifying nu 59-6150746	ımber
Name of foreign partner UNICORN PART	•	IV LP		EIN (if any) 98-1599754		Reference ID number	er (see instructions)
instructions b If "Yes," wa Was any in	s	rral method apports transferred	tnership (as define plied to avoid the red considered or antic as defined in Regula	cognition of gain up cipated to be, at			☐ Yes ☑ No ? ☐ Yes ☐ No
Part I Trans	fers Reporta	ble Under Sec	tion 6038B			- 4	
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery perio	od (f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		462,403				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
 Totals			462,403				
3 Enter the tra			t in the partnership: eported (see instru		ansfer <5	(b) After the	transfer <5 %
Part II Dispos	itions Repor	table Under S	ection 6038B				
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
REASON NO.	•		chedule subject to				☐ Yes ☑ No

Form 8865 Information Statement: Return of U.S. Persons With Respect to Certain Foreign Partnerships

The information below is being provided to assist you with the preparation of Form 8865, if required. Please consult your tax advisor to determine if you need to file the form.

Information on Pages One and Two of Form 8865

Name of Foreign Partnership: Unicorn Partners Fund IV, L.P. Address of Foreign Partnership: Unit 2502, One Hennessy

1 Hennessy Road

Wan Chai Hong Kong

EIN: 98-1599754

Country Under Whose Laws Organized: Cayman Islands
Date of Organization: January 7, 2021
Principal Place of Business: Cayman Islands

Principal Business Activity Code Number: 523900
Principal Business Activity: Investment
Functional Currency: US Dollar

Exchange Rate: N/A
Name and Address of Foreign Partnership's N/A

Agent in The U.S., If Any:

Foreign Partnership Must File: Form 1065: Efile

Name and Address of Foreign Partnership's Agent in Country of Organization, if Any:

Name and Address of Person with Custody

of Books and Records, if Different:

IQ EQ Fund Services (Hong Kong) Ltd.

Unit 605-07, Wing On Centre 111 Connaught Road Central

Hong Kong

N/A

Item H5NoItem H6NoItem H7Yes

Item H9 Exempted Limited Partnership

Item H12aNoItem H13NoneItem H14No

Schedule A-1 - Certain Partners of Foreign Partnership

No U.S. person owned a 10% or greater direct interest in the foreign partnership.

Schedule A-3 - Affiliation Schedule

Name	Address	EIN	Foreign
Alwin Capital Fund I LP	2001-04, 20/F N. Tower, Beijing Kerry Centre, Chaoyang District, Beijing, China 100020	98-1609947	Х
Bell Investment L.P.	C/O Harneys Fiduciary (Cayman) Limited, 4th Floor, Harbour Place, 103 South Church Street, P.O. Box 10240, Grand Cayman KY1-1002, Cayman Islands	N/A	X
Blue Lake Capital Opportunity Fund I, L.P.	C/O Blue Lake Capital, Suite 2703 Shanghai, China 200023	98-1608977	Х
Co-win Healthcare Fund III, L.P.	89 Nexus WAY, Camana Bay Grand Cayman, Cayman Islands KY1-9009	98-1673135	X
Cyanhill USD Fund I LP	3F Phoenix Plaza F Block Chaoyang District, Beijing, China 100028	98-1657565	X
Glory Ventures Investments Fund L.P.	3-212, 23 Lime Tree Bay Ave, PO Box 30746, Seven Mile Beach, Grand Cayman, Cayman Islands KY1-1203	98-1589582	Х
INCE Capital Partners II, L.P.	C/O Walkers Corporate Limited 190 Elgin Ave, George Town, Cayman Islands KY1-9008	98-1604337	Х
K2 Partners V L.P.	SUITE #4-210, Governors Square 23 Lime Tree Bay Avenue, PO Box 32311, Grand Cayman, Cayman Islands KY1-1209	98-1616895	Х
K2 Venture Partners II L.P.	SUITE #4-210, Governors Square 23 Lime Tree Bay Avenue, PO Box 32311, Grand Cayman, Cayman Islands KY1-1209	98-1616892	Х
K2 Venture Partners L.P.	Cassia Court, Suite 716, 10 Market Street, Camana Bay, Grand Cayman, Cayman Islands KY1-9006	98-1472176	Х
LCCP Opportunity Fund I, L.P.	5th Floor Block E, No.381 Panyu Road, Shanghai, China 200052	98-1657427	Х

Octagon Special	654 Madison Avenue, Fl 16	97 0000000	
Opportunities Fund L.P. – Series Wu	New York, NY 10065	87-0869038	
Sky9 Capital Fund V, L.P.	1133 Changning Road, Ste 1807, Raffles City, Changning, Tower 1, Shanghai, China 200051	98-1682926	Х
Sky9 Capital MVP Fund II, L.P.	1133 Changning Road, Ste 1807, Raffles City, Changning, Tower 1, Shanghai, China 200051	98-1683455	Х
Unicorn Horus Ventures Holdings Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1658457	X
01VC Fund III, L.P.	190 Elgin Avenue, George Town, Grand Cayman CJ KY1-9008	Applied For	Х
01VC Poseidon Fund I, L.P.	190 Elgin Avenue, George Town, Grand Cayman Cayman Islands, KY1-9008	98-1414906	X
Gaorong Partners Fund VI, L.P.	190 Elgin Avenue, George Town, Grand Cayman CJ KY1-9008	98-1651196	Х
INCE Opportunity Fund, L.P.	190 Elgin Avenue, George Town, Grand Cayman CJ KY1-9008	98-1604113	Х
LCCP Annex Fund II L.P.	5th Floor Block E, No.381 Panyu Road, Shanghai, CH 200052	98-1726016	Х
Linear Capital V L.P.	5th Floor Block E, No.381 Panyu Road, Shanghai, CH 200052	98-1725271	Х
Matrix Partners China VII, L.P.	PO BOX 309, Ugland House South Church Street, George Town Grand Cayman CJ KY1-1104	98-1660452	Х
Uphonest Capital, L.P.	3120 Scott Blvd Santa Clara, CA 95054	82-1028626	
Zerogoki DX-00 Prototype, L.P.	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1696595	Х
Zhen Partners Fund VII, L.P.	C/O Services Cayman Limited Grand Cayman CJ KY1-1001	98-1647236	Х
Maahes Ventures Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1681506	Х
Thoth Ventures Limited	Unit 2502, One Hennessy 1 Hennessy Road, Wan Chai Hong Kong	98-1709983	Х