EXTENDED TO MAY 17, 2021 **Exempt Organization Business Income Tax Return** Form 990-T (and proxy tax under section 6033(e)) For calendar year 2019 or other tax year beginning JUL 1, 2019 and ending JUN 30, 2020 ► Go to www.irs.gov/Form990T for instructions and the latest information. Department of the Treasury Internal Revenue Service ▶ Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3). D Employer identification numbe (Employees' trust, see Check box if Name of organization (Check box if name changed and see instructions.) B Exempt under section ORANGE COUNTY COMMUNITY FOUNDATION 33-0378778 Print E Unrelated business activity code (See instructions.) X = 501(c)(3)Number, street, and room or suite no. If a P.O. box, see instructions. Туре 408(e) 220(e) 4041 MACARTHUR BLVD., SUITE 510 408A 530(a) City or town, state or province, country, and ZIP or foreign postal code 52 529(a) NEWPORT BEACH, CA 92660 C Book value of all assets at end of year F Group exemption number (See instructions.) 365, 423, 567. G Check organization type ► X 501(c) corporation 501(c) trust 401(a) trust Other trust H Enter the number of the organization's unrelated trades or businesses.

1 Describe the only (or first) unrelated trade or business here > SEE STATEMENT 1 . If only one, complete Parts I-V. If more than one, describe the first in the blank space at the end of the previous sentence, complete Parts I and II, complete a Schedule M for each additional trade or business, then complete Parts III-V. During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? X No If "Yes," enter the name and identifying number of the parent corporation. The books are in care of ▶ SHELLEY HOSS, PRESIDENT AND CEO Telephone number \triangleright 949-553-4202 (A) Income Part I Unrelated Trade or Business Income (B) Expenses (C) Net 1a Gross receipts or sales c Balance **b** Less returns and allowances Cost of goods sold (Schedule A, line 7) Gross profit. Subtract line 2 from line 1c 3 147,919. 147,919. 4a Capital gain net income (attach Schedule D) b Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797) 4b c Capital loss deduction for trusts 4c -348,997.STMT 2 -348,997Income (loss) from a partnership or an S corporation (attach statement) 5 Rent income (Schedule C) 6 Unrelated debt-financed income (Schedule E) 7 Interest, annuities, royalties, and rents from a controlled organization (Schedule F) Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G) 9 Exploited exempt activity income (Schedule I) 10 10 Advertising income (Schedule J) 11 11 Other income (See instructions; attach schedule) 12 -201,078.-201,078.Total. Combine lines 3 through 12 Part II Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Deductions must be directly connected with the unrelated business income.) Compensation of officers, directors, and trustees (Schedule K) 14 14 15 15 Salaries and wages 16 Repairs and maintenance 16 17 Bad debts 17 Interest (attach schedule) (see instructions) 18 18 19 19 Taxes and licenses 20 Depreciation (attach Form 4562) Less depreciation claimed on Schedule A and elsewhere on return 21a 21b 21 22 Depletion 22 Contributions to deferred compensation plans 23 23 24 Employee benefit programs 24 Excess exempt expenses (Schedule I) 25 25 Excess readership costs (Schedule J) 26 26 16,400. Other deductions (attach schedule) SEE STATEMENT 3 27 27 Total deductions. Add lines 14 through 27 16,400. 28 28 -217,478. 29 Unrelated business taxable income before net operating loss deduction. Subtract line 28 from line 13 29

923701 01-27-20 LHA For Paperwork Reduction Act Notice, see instructions.

Deduction for net operating loss arising in tax years beginning on or after January 1, 2018

Unrelated business taxable income. Subtract line 30 from line 29

(see instructions)

-217,478. Form **990-T** (2019)

30

31

Schedule A - Cost of Good	s Sold. Enter	method of inver	ntory valuation 🕨 N	/A				
1 Inventory at beginning of year	1		6 Inventory at end o		6			
2 Purchases	2		7 Cost of goods sol					
3 Cost of labor	g from line 5. Enter			here and in	Part I,			
4a Additional section 263A costs			line 2	line 2 7				
(attach schedule)	(attach schedule) 4a 8 Do t				with respect to	,	Yes No	
b Other costs (attach schedule)	4b		property produced	l or acquire	d for resale) apply to			
5 Total. Add lines 1 through 4b	5		the organization?	********				
Schedule C - Rent Income (see instructions)	(From Real	Property and	Personal Proper	y Lease	ed With Real Prope	erty) 		
1. Description of property								
(1)								
(2)								
(3)								
(4)								
		ed or accrued			0/-10			
(a) From personal property (if the per rent for personal property is more 10% but not more than 50%)	e than	of rent for	and personal property (if the per personal property exceeds 50% nt is based on profit or income)	centage or if	3(a) Deductions directly columns 2(a) and	connected with the inco d 2(b) (attach schedule)	ome in	
(1)								
(2)								
(3)								
(4)								
Total	0.	Total		0.				
(c) Total income. Add totals of columns here and on page 1, Part I, line 6, column	n (A)	▶		0.	(b) Total deductions. Enter here and on page 1, Part I, line 6, column (B)	>	0.	
Schedule E - Unrelated Deb	ot-Financed	Income (see	instructions)					
			Gross income from or allocable to debt-		3. Deductions directly conn to debt-finance	ed property		
1. Description of debt-fi	nanced property		financed property	(a)	Straight line depreciation (attach schedule)	(b) Other dedu (attach sche		
(1)								
(2)								
(3)		_	·					
(4)								
4. Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)	of or a debt-fina	adjusted basis allocable to nced property h schedule)	6. Column 4 divided by column 5		7. Gross income reportable (column 2 x column 6)	8. Allocable de (column 6 x total 3(a) and 3	of columns	
(1)				%				
(2)				%				
(3)				%	****			
(4)				%				
V.7				E	Enter here and on page 1, Part I, line 7, column (A).	Enter here and or Part I, line 7, col		
Totals					0.	.]	0.	
Total dividends-received deductions in					Ĭ.		0.	

Form 990-T (2019)

Schedule F - Interest,	Annuities, Royal		Controlled O			itions	(see ins	truction	s)	
1. Name of controlled organiza	Name of controlled organization 2. Employer identification				tal of specified ments made	ial of specified 5, Part of		olling	6. Deductions directly connected with income	
	num	ber				organiza	ation's gross i	ncome	in column 5	
(1)						 				
(2)										
(3)										
(4)										
Nonexempt Controlled Organ	izations									
7. Taxable Income	8. Net unrelated incom (see instructions	ne (loss) 9. Tota	al of specified payr made	nents	10. Part of colu in the controll gros	mn 9 that ing organ s income	is included ization's	11. De with	ductions directly connected income in column 10	
(1)										
(2)										
(3)										
(4)										
					Add colur Enter here and line 8,		1, Part I,	Enter h	ld columns 6 and 11. ere and on page 1, Part I, line 8, column (B).	
Totals				>			0.		0	
Schedule G - Investme	ent Income of a S	Section 501(c)(7), (9), or (17) Orç	ganization					
	cription of income		2. Amount of	in a seco	3. Deduction	ons	4. Set-	asides	5. Total deductions and set-asides	
1, 060	oriphori of income		Z. Amount of	Income	(attach sched		(attach s		(col. 3 plus col. 4)	
(1)										
(2)	44									
(3)										
(4)						ladasoka Ilako				
			Enter here and Part I, line 9, co	lumn (A).					Enter here and on page ⁻ Part I, line 9, column (B).	
Totals Schedule I - Exploited	Evament Astivitu		Thon Adv	0.	a Incomo				0.	
see instr	•	income, Other	r Illali Aus	ei tisii	ig income					
Description of exploited activity	2. Gross unrelated business income from trade or business	3. Expenses directly connected with production of unrelated business income	4. Net incom from unrelated business (cominus colum gain, compute through	trade or lumn 2 n 3), If a cols, 5	5. Gross income from activity is not unrelated business income	that ted	6. Exp attribut colur	able to	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).	
(1)										
(2)										
(3)										
(4)										
	Enter here and on page 1, Part I, line 10, col. (A).	Enter here and on page 1, Part I, line 10, col. (B).							Enter here and on page 1, Part II, line 25.	
Totals► Schedule J - Advertisi	ng Income (see i	nstructions)							0.	
	Periodicals Repo		solidated	Basis				······································		
			4. Advert	ieina coir					7. Excess readership	
1. Name of periodical	2. Gross advertising income	3. Direct advertising costs	or (loss) (c	ol. 2 minus iin, comput	5. Circula income		6. Reade cost		costs (column 6 minus column 5, but not more than column 4).	
(1)					-					
(2)										
(3)			_							
(4)										
Totals (carry to Part II, line (5))		0. 0).			i		ı	0.	

Form 990-T (2019) ORANGE COUNTY COMMUNITY FOUNDATION 33-03787 Part II Income From Periodicals Reported on a Separate Basis (For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

2. Gross advertising income	3. Direct advertising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
0.	0.				0.
Enter here and on page 1, Part I, line 11, col. (A).	Enter here and on page 1, Part I, line 11, col. (B).				Enter here and on page 1, Part II, line 26.
0.	0.				0.
	advertising income O • Enter here and on page 1, Part 1, line 11, col. (A).	advertising advertising costs O • O • O • Enter here and on page 1, Part 1, line 11, col. (A). line 11, col. (B).	2. Gross advertising advertising costs or (loss) (col. 2 minus col. 3), If a gain, compute cols. 5 through 7. O • O • Enter here and on page 1, Part 1, line 11, col. (A). line 11, col. (B).	2. Gross advertising income 3. Direct advertising costs or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7. 5. Circulation income 5. Circulation income 5. Circulation income 5. Circulation income 6. Sthrough 7. 6. Enter here and on page 1, Part 1, line 11, col. (A). line 11, col. (B).	2. Gross advertising income 3. Direct advertising costs or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7. 5. Circulation income 6. Readership costs costs 1. Enter here and on page 1, Part 1, line 11, col. (A). Enter here and on page 1, Part 1, line 11, col. (A).

Schedule K - Compensation of Officers, Directors, and Trustees (see instructions)

1. Name	2. Title	Percent of time devoted to business	Compensation attributable to unrelated business
(1)		%	
(2)		%	
(3)		%	
(4)		%	
Total. Enter here and on page 1, Part II, line 14	0.		

Form 990-T (2019)

FORM 990-T DESCRIPTION OF ORGANIZATION'S PRIMARY UNRELATED STATEMENT 1
BUSINESS ACTIVITY

SHAREHOLDER IN LIMITED PARTNERSHIPS

TO FORM 990-T, PAGE 1

DENHAM OIL & GAS FUND	FORM 990-T INCOME (LOSS) FROM PARTNERSHIPS	STATEMENT 2
DENHAM OIL & GAS FUND - OTHER PORTFOLIO INCOME (LOSS)	DESCRIPTION	
DENHAM OIL & GAS FUND - OTHER INCOME (LOSS) -138,046 H.I.G. REALTY PARTNERS III (ONSHORE), LP - ORDINARY BUSINESS INCOME (LOSS) -23,149 H.I.G. REALTY PARTNERS III (ONSHORE), LP - OTHER PORTFOLIO INCOME (LOSS) -5,974 INDUSTRY VENTURES - OTHER PORTFOLIO INCOME (LOSS) -21 INCUSTRY VENTURES - OTHER PORTFOLIO INCOME (LOSS) -21 INCOME (LOSS) -762 RCP SECONDARY OPPORTUNITY FUND II, LP - ORDINARY BUSINESS INCOME (LOSS) -907 CANNON HERITAGE LIMITED PARTERSHIP - ORDINARY BUSINESS INCOME (LOSS) -654 KDF COMMUNITIES - CITY TOWERS, LLC - ORDINARY BUSINESS INCOME (LOSS) -77,601 INCOME STREET IX - ORDINARY BUSINESS INCOME (LOSS) -77,601 DOVER STREET IX - INTEREST INCOME (LOSS) -3,540 DOVER STREET IX - INTEREST INCOME (LOSS) -44,617 ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) -44,617 ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) -21,847 ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) -21,847 ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) -46,809 BUCKAP ENERGY CAPITAL FUND XI, LP - ORDINARY BUSINESS INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -5,42 BUCKAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -5,42 BUCKAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -5,42 BUCKAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) -28,510 DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) -5,42 BUCKAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) -618. BUCKAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) -5,42 BUCKAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) -618. BUCKAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) -618. BUCKAP FLATROCK MIDSTREAM FUND - OTHER INC	DENHAM OIL & GAS FUND - ORDINARY BUSINESS INCOME (LOSS)	108,395.
H.I.G. REALTY PARTMERS III (ONSHORE), LP - ORDINARY BUSINESS INCOME (LOSS) H.I.G. REALTY PARTMERS III (ONSHORE), LP - OTHER PORTFOLIO INCOME (LOSS) -5,974 INDUSTRY VENTURES - OTHER PORTFOLIO INCOME (LOSS) CARNON YENTURES - ORDINARY BUSINESS INCOME (LOSS) RCP SECONDARY OPPORTUNITY FUND II, LP - ORDINARY BUSINESS INCOME (LOSS) CANNON HERTIAGE LIMITED PARTERSHIP - ORDINARY BUSINESS INCOME (LOSS) CANNON HERTIAGE LIMITED PARTERSHIP - ORDINARY BUSINESS INCOME (LOSS) KDF COMMUNITIES - CITY TOWERS, LLC - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET IX - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET IX - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET IX - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET IX - OTHER PORTFOLIO INCOME (LOSS) BOVER STREET IX - OTHER PORTFOLIO INCOME (LOSS) BOVER STREET IX - OTHER PORTFOLIO INCOME (LOSS) ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) CENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - OTHER FORTFOLIO INCOME (LOSS) -15,265 BOVER STREET X - OTHER FORTFOLIO INCOME (LOSS) -14,644 HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) -14,644 HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) -14,644 HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) -14,644 HARBOURVEST REAL ESTATE III, LP - OTHER INCOME (LOSS) -14,644 HARBOURVEST REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -14,644 HARBOURVEST REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -15,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -14,644	DENHAM OIL & GAS FUND - OTHER PORTFOLIO INCOME (LOSS)	-578.
BUSINESS INCOME (LOSS)	DENHAM OIL & GAS FUND - OTHER INCOME (LOSS)	-138,046.
H.I.G. REALTY PARTNERS III (ONSHORE), LP - OTHER PORTFOLIO -5,974 INCOME (LOSS)	H.I.G. REALTY PARTNERS III (ONSHORE), LP - ORDINARY	
INCOME (LOSS)	BUSINESS INCOME (LOSS)	-23,149.
INDUSTRY VENTURES - OTHER PORTFOLIO INCOME (LOSS)		
LLCP I FIG TREE - ORDINARY BUSINESS INCOME (LOSS) RCP SECONDARY OPPORTUNITY FUND II, LP - ORDINARY BUSINESS INCOME (LOSS) CANNON HERTIAGE LIMITED PARTERSHIP - ORDINARY BUSINESS INCOME (LOSS) KDF COMMUNITIES - CITY TOWERS, LLC - ORDINARY BUSINESS INCOME (LOSS) KDF COMMUNITIES - CITY TOWERS, LLC - OTHER PORTFOLIO INCOME (LOSS) NOOME (LOSS) NOOME (LOSS) NOOME (LOSS) INCOME (LOSS) INC		
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INCOME (LOSS) CANNON HERTIAGE LIMITED PARTERSHIP - ORDINARY BUSINESS INCOME (LOSS) KDF COMMUNITIES - CITY TOWERS, LLC - ORDINARY BUSINESS INCOME (LOSS) KOF COMMUNITIES - CITY TOWERS, LLC - OTHER PORTFOLIO INCOME (LOSS) NOOME (LOSS) OF THE STREET IX - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET IX - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET IX - INTEREST INCOME DOVER STREET IX - OTHER PORTFOLIO INCOME (LOSS) BOVER STREET IX - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET IX - OTHER INCOME (LOSS) DOVER STREET IX - OTHER INCOME (LOSS) ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) ALPINE INVESTORS VII, LP - OTHER INCOME (LOSS) ALPINE INVESTORS VII, LP - OTHER INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - ORDINARY BUSINESS INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) -51,42 STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) -58,036 ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) -19,18 CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169		762.
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INCOME (LOSS)		-907.
RDF COMMUNITIES - CITY TOWERS, LLC - ORDINARY BUSINESS INCOME (LOSS) 8,832		
INCOME (LOSS)		-654.
RDF COMMUNITIES - CITY TOWERS, LLC - OTHER PORTFOLIO INCOME (LOSS)		
1000me (Loss)	·	8,832.
DOVER STREET IX		
DOVER STREET IX - INTEREST INCOME 2,939 DOVER STREET IX - DIVIDEND INCOME 6,318 DOVER STREET IX - OTHER PORTFOLIO INCOME (LOSS) 8,582 DOVER STREET IX - OTHER INCOME (LOSS) -44,617 ALPINE INVESTORS VII, LP - ORDINARY BUSINESS INCOME (LOSS) -21,847 ALPINE INVESTORS VII, LP - OTHER INCOME (LOSS) -46,809 ENCAP ENERGY CAPITAL FUND XI, LP - ORDINARY BUSINESS INCOME (LOSS) -15,265 ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) -28,510 DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) -26,710 DOVER STREET X - INTEREST INCOME (LOSS) -26,710 DOVER STREET X - DIVIDEND INCOME -72,7 DOVER STREET X - DIVIDEND INCOME -72,7 DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) -14,644 HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) -5,142 STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) -618 ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) -18,372 CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) -1,918 CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME -1,918 CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME -1,169 (LOSS) -1,169		
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ALPINE INVESTORS VII, LP - OTHER INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - ORDINARY BUSINESS INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - INTEREST INCOME DOVER STREET X - DIVIDEND INCOME DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,918 CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518		•
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INCOME (LOSS) ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - INTEREST INCOME DOVER STREET X - DIVIDEND INCOME DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) T-407 DOVER STREET X - OTHER INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518.		-40,009.
ENCAP ENERGY CAPITAL FUND XI, LP - OTHER INCOME (LOSS) DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - INTEREST INCOME DOVER STREET X - DIVIDEND INCOME DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518.		_15 265
DOVER STREET X - ORDINARY BUSINESS INCOME (LOSS) DOVER STREET X - INTEREST INCOME DOVER STREET X - DIVIDEND INCOME DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518	FNCAD FNFPCV CADIMAL FIND VI LD _ OMBED INCOME /LOGG\	-15,265. -28 510
DOVER STREET X - INTEREST INCOME DOVER STREET X - DIVIDEND INCOME DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518	DOVED CODERT Y _ ODDINADY RICTNEES THOOME (LOSS)	
DOVER STREET X - DIVIDEND INCOME DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518	·	
DOVER STREET X - OTHER PORTFOLIO INCOME (LOSS) DOVER STREET X - OTHER INCOME (LOSS) HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169 -1,169		
DOVER STREET X - OTHER INCOME (LOSS) HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518		
HARBOURVEST REAL ASSETS FUND IV L.P - OTHER INCOME (LOSS) STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -5,142 -618 -58,036 -18,372 -1,918 -1,918 -1,918 -1,169 -1,169 -1,169		
STEELE OFFSHORE (ALTERNATIVE), LP - OTHER INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169		
ENCAP FLATROCK MIDSTREAM FUND - ORDINARY BUSINESS INCOME (LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) A74. CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518.		
(LOSS) ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -58,036 -18,372 -1,918		010.
ENCAP FLATROCK MIDSTREAM FUND - OTHER INCOME (LOSS) -18,372 CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) -1,918 CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME 474 CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,169 CHARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518 CHARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME		-58.036.
CAPITAL DYNAMICS REAL ESTATE III, LP - ORDINARY BUSINESS INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169		
INCOME (LOSS) CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169 -1,169		20,012.
CAPITAL DYNAMICS REAL ESTATE III, LP - INTEREST INCOME CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518	·	-1.918.
CAPITAL DYNAMICS REAL ESTATE III, LP - OTHER PORTFOLIO INCOME (LOSS) -1,169 HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518.		474.
INCOME (LOSS) HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) -1,169		_ / **
HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME (LOSS) 13,518		-1.169.
(LOSS) 13,518	HARVEST MLP INCOME FUND LLC - ORDINARY BUSINESS INCOME	-,
TOTAL INCLUDED ON FORM 990-T, PAGE 1, LINE 5	(LOSS)	13,518.
-340,997.	TOTAL THELLIDED ON FORM 990-T DAGE 1 LINE F	_3/10 007
	TOTAL INCHOLED ON FORM 950-1, FAGE 1, HINE 9	-340,33/•

FORM 990-T	OTHER DEDUCTIONS	STATEMENT 3
DESCRIPTION		AMOUNT
ACCOUNTING FEES		16,400.
TOTAL TO FORM 990-T, PAGE 1,	LINE 27	16,400.

FORM 990-T	NAME OF FOREIGN	COUNTRY IN WHICH	STATEMENT 4
rokm 330-1	MARIE OF FOREIGN	COOMINI IN MILICII	DIVIDMENT 4
	ORGANIZATION HAS	FINANCIAL INTEREST	
	ORGINAL DELLE TOR THE	I TIMICTIM THITIDI	

NAME OF COUNTRY

CAYMAN ISLANDS BERMUDA

FORM 990-T	NET	OPERATING LOSS	DEDUCTION	STATEMENT 5
TAX YEAR	LOSS SUSTAINED	LOSS PREVIOUSLY APPLIED	LOSS REMAINING	AVAILABLE THIS YEAR
06/30/12	40,800.	40,800.	0.	0.
06/30/13	61,160.	61,160.	0.	0.
06/30/14	31,369.	31,369.	0.	0.
06/30/16	89,287.	89,287.	0.	0.
06/30/17	172,467.	172,467.	0.	0.
06/30/18	550,039.	376,352.	173,687.	173,687.
NOL CARRYOV	ER AVAILABLE THIS	YEAR	173,687.	173,687.

FORM 990-T	CONTRIBUTIONS	STATEMENT 6		
DESCRIPTION/KIND OF PROPERTY	METHOD USED TO DETERMINE FMV	AMOUNT		
OCCF PASSTHROUGH CONTRIBUTION	N/A N/A	96,271,852. 637.		
TOTAL TO FORM 990-T, PAGE 2, L	INE 34	96,272,489.		

FORM 990-T	CONTRIBUTIONS SUMMARY		STATEMENT 7
**	CONTRIBUTIONS SUBJECT TO 100% LIMIT CONTRIBUTIONS SUBJECT TO 25% LIMIT		
FOR TAX FOR TAX FOR TAX	OF PRIOR YEARS UNUSED CONTRIBUTIONS YEAR 2014 55,597,627 YEAR 2015 111,013,754 YEAR 2016 54,559,380 YEAR 2017 76,409,597 YEAR 2018		
TOTAL CARR	YOVER ENT YEAR 10% CONTRIBUTIONS	297,580,358 96,272,489	
	RIBUTIONS AVAILABLE COME LIMITATION AS ADJUSTED	393,852,847 0	_
EXCESS 100	TRIBUTIONS % CONTRIBUTIONS SS CONTRIBUTIONS	393,852,847 0 393,852,847	_
ALLOWABLE	CONTRIBUTIONS DEDUCTION		0
TOTAL CONT	RIBUTION DEDUCTION		0

SCHEDULE D (Form 1120)

Department of the Treasury Internal Revenue Service

Capital Gains and Losses

▶ Attach to Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-IC-DISC, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF, or certain Forms 990-T.
▶ 60 to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

Name

Employer identification number

ORANGE COUNTY COMM	UNITY FOUNDATIO	ON		33-	0378778
Did the corporation dispose of any investmen	nt(s) in a qualified opportunit	v fund during the tax	vear?		Yes X No
If "Yes," attach Form 8949 and see its instru-					. ,
Part I Short-Term Capital Gai					
See instructions for how to figure the amounts to enter on the lines below.	(d) Proceeds	(e) Cost	(g) Adjustments to gair or loss from Form(s) 894	1	(h) Gain or (loss). Subtract column (e) from column (d) and
This form may be easier to complete if you round off cents to whole dollars.	(sales price)	(or other basis)	Part I, line 2, column (g)	j, 	combine the result with column (g)
1a Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b					
1b Totals for all transactions reported on					
Form(s) 8949 with Box A checked					
2 Totals for all transactions reported on					
Form(s) 8949 with Box B checked					
3 Totals for all transactions reported on					
Form(s) 8949 with Box C checked	5,698.				5,698.
4 Short-term capital gain from installment sales				4	
5 Short-term capital gain or (loss) from like-kind	d exchanges from Form 8824			5	
6 Unused capital loss carryover (attach computa	ation)			6	(
7 Net short-term capital gain or (loss). Combine				7	5,698.
Part II Long-Term Capital Gai	ns and Losses (See in	structions.)			
See instructions for how to figure the amounts to enter on the lines below.	(4)	(e)	(n) Adjustments to gain		(h) Gain or (loss). Subtract
This form may be easier to complete if you round off cents to whole dollars.	(d) Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to gair or loss from Form(s) 894 Part II, line 2, column (g	column (e) from column (d) and combine the result with column (g)	
8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b					
8b Totals for all transactions reported on					
Form(s) 8949 with Box D checked					
9 Totals for all transactions reported on					
Form(s) 8949 with Box E checked					
10 Totals for all transactions reported on					
Form(s) 8949 with Box F checked	120,867.				120,867.
11 Enter gain from Form 4797, line 7 or 9				11	21,354.
12 Long-term capital gain from installment sales				12	
13 Long-term capital gain or (loss) from like-kind	d exchanges from Form 8824			13	
				14	
15 Net long-term capital gain or (loss). Combine		<u>h</u>		15	142,221.
Part III Summary of Parts I and					
16 Enter excess of net short-term capital gain (lin				16	5,698.
17 Net capital gain. Enter excess of net long-term			ne 7)	17	142,221.
18 Add lines 16 and 17. Enter here and on Form		er line on other returns		18	147,919.
Note: If losses exceed gains, see Capital Los	ses in the instructions.				
LHA For Paperwork Reduction Act Notice,	see the Instructions for Form 1	120.		s	chedule D (Form 1120) 2019

Internal Revenue Service

Sales and Other Dispositions of Capital Assets

► Go to www.irs.gov/Form8949 for instructions and the latest information. File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D. OMB No. 1545-0074

Name(s) shown on return

Social security number or taxpayer identification no. 33-0378778

Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either will show whether your basis (usually your cost) was reported to the IRS by your

broker and may even tell you which box to check.

Short-Term. Transactions involving capital assets you held 1 year or less are generally short-term (see instructions). For long-term transactions, see page 2. Note: You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

(A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)

ORANGE COUNTY COMMUNITY FOUNDATION

(B) Short-term transactions reported on Form(s) 1099-B showing basis wasn't reported to the IRS X (C) Short-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or loss. If you enter an amount (h) Proceeds Cost or other Date sold or Description of property Gain or (loss). Date acquired in column (g), enter a code in column (f). See instructions. (sales price) basis. See the Subtract column (e) (Example: 100 sh. XYZ Co.) (Mo., day, yr.) disposed of Note below and from column (d) & (Mo., day, yr.) (f) (g) Amount of combine the result see Column (e) in Code(s) with column (g) the instructions adjustment DENHAM OIL & GAS 1,951. 1,951. FUND VARIOUS VARIOUS 0. VARIOUS VARIOUS DOVER STREET IX 1,617. 0. 1,617. VARIOUS VARIOUS DOVER STREET X 2,083. 0. 2,083. CAPITAL DYNAMICS REAL ESTATE III, VARIOUS VARIOUS 47. 0. 47. LP 2 Totals. Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 1b (if Box A above is checked), line 2 (if Box B 5,698. 5,698. above is checked), or line 3 (if Box C above is checked)

Note: If you checked Box A above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.

923011 12-11-19 LHA For Paperwork Reduction Act Notice, see your tax return instructions.

Form 8949 (2019)

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on page 1

Social security number or taxpayer identification no.

ORANGE COUNTY COMMUNITY FOUNDATION

33-0378778

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either will show whether your basis (usually your cost) was reported to the IRS by your broker and may even tell you which box to check.

Part II Long-Term. Transactions involving capital assets you held more than 1 year are generally long-term (see instructions). For short-term transactions, see page 1.

Note: You may aggregate all long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 8a; you aren't required to report these transactions on Form 8949 (see instructions).

You must check Box D, E, or F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box.

If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)

(E) Long-term transactions reported on Form(s) 1099-B showing basis wasn't reported to the IRS

(F) Long-term transactions not reported to you on Form 1099-B

1 (a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed of (Mo., day, yr.)	(d) Proceeds (sales price)	(e) Cost or other basis. See the Note below and see Column (e) in the instructions	loss. If you in column (f	nt, if any, to gain or ou enter an amount (g), enter a code in). See instructions. (g) Amount of adjustment	(h) Gain or (loss). Subtract column (e) from column (d) & combine the result with column (g)
DENHAM OIL & GAS						aajaatiiiaiit	
FUND	VARIOUS	VARIOUS	18,401.	0.			18.401.
DOVER STREET IX		VARIOUS	87,696.	0.			18,401. 87,696.
DOVER STREET X		VARIOUS	14,770.	0.			14,770.
							, , , , , , , , , , , , , , , , , , , ,
						·	

2 Totals. Add the amounts in colur	nns (d), (e), (g), a	nd (h) (subtract					
negative amounts). Enter each to	tal here and inclu	ıde on your					
Schedule D, line 8b (if Box D abo	ove is checked),	line 9 (if Box E					
above is checked), or line 10 (if E	Box F above is ch	necked)	120,867.				120,867.

Note: If you checked Box D above but the basis reported to the IRS was incorrect, enter in column (e) the basis as reported to the IRS, and enter an adjustment in column (g) to correct the basis. See Column (g) in the separate instructions for how to figure the amount of the adjustment.

Form 8949 (2019)

Form **4797**

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

Sales of Business Property

(Also Involuntary Conversions and Recapture Amounts Under Sections 179 and 280F(b)(2))

▶ Attach to your tax return.

► Go to www.irs.gov/Form4797 for instructions and the latest information.

OMB No. 1545-0184 2019

Attachment Sequence No. 27

ORA	ANGE COUNTY COMMUNI	TY FOUND	NOITA				3	3-0378778
	nter the gross proceeds from sales or			019 on Form(s) 10	99-B or 1099-S		П	
	r substitute statement) that you are in	cluding on line 2	2, 10, or 20				1	
Pai		of Property I	Jsed in a Tra	ide or Busines	s and Involun	tary Conve	rsion	s From
	Other Than Casualty	or Theft-Mo	st Property	Held More Tha	an 1 Year (see	instructions)		
2	(a) Description of property	(b) Date acquired (mo., day, yτ.)	(С) Date sold (то., day, уг.)	(d) Gross sales price	(e) Depreciation allowed or allowable since acquisition	(f) Cost or other basis, plus improvements a expense of sa	and	(g) Gain or (loss) Subtract (f) from the sum of (d) and (e)
SE	E STATEMENT 8			21,354.		1		21,354.
3	Gain, if any, from Form 4684, line 39						3	
4	Section 1231 gain from installment						4	
5	Section 1231 gain or (loss) from like						5	
6	Gain, if any, from line 32, from other						6	01 051
7	Combine lines 2 through 6. Enter the					133	7	21,354.
	Partnerships and S corporations. line 10, or Form 1120-S, Schedule K	, ,	, ,	•	or Form 1065, Sch	nedule K,		
	Individuals, partners, S corporation from line 7 on line 11 below and skip 1231 losses, or they were recapture the Schedule D filed with your return	o lines 8 and 9. If d in an earlier ye	line 7 is a gain a ar, enter the gair	and you didn't have n from line 7 as a lo	e any prior year se	ction		
	Names and used not postion 1001 los	ana fuama muiau wa	ara Caa inatura	tiono			8	
8	Nonrecaptured net section 1231 los Subtract line 8 from line 7. If zero or					F"	- ^ +	
9	line 9 is more than zero, enter the a	*	•	•				
	capital gain on the Schedule D filed						9	21,354.
-								
Pai	t II Ordinary Gains and	LOSSES (see in	structions)					
10	Ordinary gains and losses not include	ded on lines 11 th	rough 16 (includ	le property held 1	year or less):			
•								
11	Loss, if any, from line 7						11 (,
12	Gain, if any, from line 7 or amount fr	om line 8, if appl	icable			[12	
13	Gain, if any, from line 31						13	
14	Net gain or (loss) from Form 4684, li						14	
15	Ordinary gain from installment sales	from Form 6252	, line 25 or 36				15	
16	Ordinary gain or (loss) from like-kind						16	
17	Combine lines 10 through 16					ı	17	
18	For all except individual returns, ent							
	a and b below. For individual returns			., ,				
а	If the loss on line 11 includes a loss	•		(b)(ii), enter that n	art of the loss here	. Enter the		
_	loss from income-producing propert					36		
	on property used as an employee.) I	-	•		•	· · · · · · · · · · · · · · · · · · ·	18a	service in the constitution of the const
h	Redetermine the gain or (loss) on lin						T	
~	(Form 1040 or Form 1040-SR), Part						18b	
I HA	For Paperwork Reduction Act N							Form 4797 (2019)

Pa	rt III Gain From Disposition of Propert	y Und	er Sections 124	5, 1250, 1252	2, 125	4, and 1255	(see	instructions)
19	(a) Description of section 1245, 1250, 1252, 1254, o	or 1255 p	property:			(b) Date acqui (mo., day, yr		(c) Date sold (mo., day, yr.)
<u> A</u>								
В								
<u></u> C								
<u>D</u>								
	These columns relate to the properties on lines 19A through 19D.	•	Property A	Property	В	Property	С	Property D
20	Gross sales price (Note: See line 1 before completing.)	20						
21	Cost or other basis plus expense of sale	21						
22	Depreciation (or depletion) allowed or allowable	22						
23	Adjusted basis. Subtract line 22 from line 21	23						
24	Total gain. Subtract line 23 from line 20	24						
	If section 1245 property:							
	Depreciation allowed or allowable from line 22	25a						
	Enter the smaller of line 24 or 25a	25b	***************************************					
26	If section 1250 property: If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.							
	Additional depreciation after 1975. See instructions	26a						
b	Applicable percentage multiplied by the smaller of line 24 or line 26a. See instructions	26b						
С	Subtract line 26a from line 24. If residential rental property or line 24 isn't more than line 26a, skip lines 26d and 26e	26c						
d	Additional depreciation after 1969 and before 1976	26d						
е	Enter the smaller of line 26c or 26d	26e						
	Section 291 amount (corporations only)	26f	······································					
<u> </u>	Add lines 26b, 26e, and 26f	26g						
	If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership.							
	Soil, water, and land clearing expenses	27a						
	Line 27a multiplied by applicable percentage	27b						
	Enter the smaller of line 24 or 27b	27c						· · · · · · · · · · · · · · · · · · ·
	If section 1254 property: Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions	28a						
b	Enter the smaller of line 24 or 28a	28b			I			
	If section 1255 property: Applicable percentage of payments excluded from income under section 126. See instructions	29a						· · · · · · · · · · · · · · · · · · ·
b	Enter the smaller of line 24 or 29a. See instructions	29b						,
Sur	mmary of Part III Gains. Complete property c	olumns	A through D through	line 29b before	going t	o line 30.		
30	Total gains for all properties. Add property columns	A throu	gh D, line 24				30	
31 32	Add property columns A through D, lines 25b, 26g, Subtract line 31 from line 30. Enter the portion from		•			ortion	31	
	from other than casualty or theft on Form 4797, line	6					32	
Pa	rt IV Recapture Amounts Under Sectio	ns 179	and 280F(b)(2)	When Busin	ess U	se Drops to		or Less
***************************************	(200 HISHUUNIA)					(a) Section 179	1	(b) Section 280F(b)(2)
33	Section 179 expense deduction or depreciation allo	wable in	prior years		33			
34					34			
35	Recapture amount. Subtract line 34 from line 33. Se				35			
								Earm 4797 (2010

FORM 4797	PRO	OPERTY HEI	LD MORE THAN	ONE YEAR	STA	ATEMENT 8
DESCRIPTION	DATE ACQUIRED	DATE SOLD	SALES PRICE	DEPR.	COST OR BASIS	GAIN OR LOSS
CAPITAL DYNAMICS REAL ESTATE III,	VARIOUS	VARIOUS				
LP			1,244.		0.	1,244.
DENHAM OIL & GAS FUND	VARIOUS	VARIOUS	9,769.		0.	9,769.
H.I.G. REALTY PARTNERS III	VARIOUS	VARIOUS				
(ONSHORE), LP			10,197.		0.	10,197.
DOVER STREET IX	VARIOUS	VARIOUS	144.		0.	144.
TOTAL TO 4797, PA	RT I, LIN	E 2	21,354.		0.	21,354.

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

Department of the Treasury Internal Revenue Service

beginning JAN 1 , 2019, and ending DEC 31 , 2019

Name of person filing this return					Filer'	s identifica	tion numbe	7
					3	3-037	8778	
ORANGE COUNTY COMM	UNITY	FOUNDATION						
Filer's address (if you aren't filing this form wi	ith your tax re	turn)	A Category o	of filer (see Categories	of Filers in the	e instructions	and check app	olicable box(es)):
			1	2] 3		4	
			B Filer's tax y	year JUL 1	,201	9, and end	_{ing} JUN	30,2020
C Filer's share of liabilities: Nonrecourse \$		Qualified non	recourse financii	ng \$		Other	\$	
D If filer is a member of a consolidated group	p but not the j	parent, enter the following	g information abo	out the parent:				
Name					EIN			
Address								
E Check if any excepted specified foreign final	ancial assets	are reported on this form	. See instructions	3				
F Information about certain other partners (s	see instruction	18)		Y		T		
(1) Name		(2) Address		(3) Identification	number	(4)	Check applica	able box(es)
(i) Name		(z) Address		(o) Identification		Category 1	Category 2	Constructive owner
			,				<u> </u>	
G1 Name and address of foreign partnership						2(a) EIN		004
EMR CAPITAL RESOURCES	S FUND	III, LP					-1489	
100						2(b) Rete	rence ID nu	mber
190 ELGIN AVENUE		A Caumba		[
GEORGE TOWN, CAYMAN		1 -		se laws organized				
. Date of Principal place		6 Principal business activity code number	7 Principal bus	siness	Func		N ISL	ange rate
4 Date of 4 organization 5 Principal place 5 of business 02/15/2019 CAYMAN ISL.	8a Func USD	ncy	on (see i	nstructions) • 0 0 0 0 0 0				
		523900	INVESTM	EMI	עפט			.000000
H Provide the following information for the following information for the following information number1 Name, address, and identification number			0 Chook if th	ne foreign partners	hin must fil	0.		
I Name, address, and identification number	oi ageiii (ii ai	ly) ill the United States	ļ ,	orm 1042	Form 88		Form 106	25
				enter where Form			FORM TO	J3
			Sel vice de	auter muere Lottit	1003 15 11160	l .		
3 Name and address of foreign partnership's	s agent in cou	ntry of organization, if an	Name and a	ddress of person(s) wi and the location of su	th custody of	the books and	d records of th	e foreign
• Hamo and address of foreign partnership t	agont iii ood	ing or organization, it all	partite ship,	and the location of ad	on books and	riecords, ir dii	1010111	
5 During the tax year, did the foreign partr	nership pay or	accrue any interest or ro	yalty for which t	he deduction is no	t			
allowed under section 267A? See instruc	ctions						Yes	X No
If "Yes," enter the total amount of the dis							\$	
6 Is the partnership a section 721(c) partn							Yes	X No
7 Were any special allocations made by th	e foreign part	nership?				▶	Yes	X No
8 Enter the number of Forms 8858, Inform	nation Return	of U.S. Persons With Res	spect to Foreign I	Disregarded Entitie	s			
(FDEs) and Foreign Branches (FBs), atta						🕨		0
9 How is this partnership classified under						LTD P	ARTNE	RSHIP
10 a Does the filer have an interest in the fore								
separate unit under Reg. 1.1503(d)-1(b)	(4) or part of	a combined separate unit	under Reg. 1.15	i03(d)-1(b)(4)(ii)?	If "No,"			
skip question 10b						▶	Yes	X No
b If "Yes," does the separate unit or combine			-					
Reg. 1.1503(d)-1(b)(5)(ii)?							Yes	∟∟ No
11 Does this partnership meet both of the fo)				
1. The partnership's total receipts for th	•	, ,						
2. The value of the partnership's total as		d of the tax year was less	s than \$1 million.	•			Yes	No
If "Yes," don't complete Schedules L, M-				<u> </u>				
LHA For Privacy Act and Paperwork Reduc	ction Act Noti	ce, see the separate ins	tructions.					Form 8865 (2019)

Form 8	865 (2019)	ORANGE COUNTY CO	MMUM	TTY FOUNDATIO	N			<u> 3-0</u>	3/8/	/ 8	Page 2
12 a	Is the filer of	this Form 8865 claiming a foreign-de	rived inta	angible income deduction (u	nder section 2	250) with resp	ect to		_		7
	•							▶∟	_ Yes	X	No
b	-	r the amount of gross income derived				-					
		tions with or by the foreign partnershi	p that the	e filer included in its comput	ation of foreig	gn-derived de	duction				
	eligible inco	, , , , , , , , , , , , , , , , , , , ,						–			
C	•	r the amount of gross income derived									
		I in its computation of FDDEI r the amount of gross income derived		wiege provided to or by the f				_			
ď								▶ _			
13	Enter the nu	mber of foreign partners subject to se	ction 864	(c)(8) as a result of transfer	ring all or a p	ortion of an ir	nterest in				
		hip or of receiving a distribution from						▶ _			
14	At any time	during the tax year were any transfers	between	the partnership and its parti	ners subject to	the disclosu	re	r	_		٦
	•	s of Regulations section 1.707-8?							_ Yes	X	No
15 a		iny transfers of property or money wit									
		equire disclosure under Regs. 1.703-3		·					٦٧	TV	7
		alue of each transfer, and an explanati			•				_ Yes	LA	No
b		nership assume a liability or receive pr lod of transferring the property to the									
		or value of each transfer, the debt assi		•					Yes	X	No
Sign Her	e Only Under p	enalties of perjury, I declare that I have exami	ned this re	turn, including accompanying sch	edules and state	ements, and to t	he best of my know		belief, it is	true,	1 110
if You're This Forr		and complete. Declaration of preparer (other	than gener	al partner or limited liability comp	any member) is I	pased on all info	rmation of which p	eparer ha	s any know	rledge.	
Separate	ly and										
Not With Tax Retu		Signature of general partner or limited liability	company n	nember					Da	ite	
Paid	Print/Ty	oe preparer's name	Prepa	rer's signature		Date	Check] if F	TIN		
Prep	arer PATI	RICIA J. MAYER					self-emplo	yed	P001	<u>8864</u>	13
Use	Firm's	name ►MOSS ADAMS L	ЬP				Firm's EIN		-018		3
Only	Firm's	address ►4747 EXECUTI	VE D	R SUITE 1300)		Phone no.85	8-6	27-1	400	
		DIEGO, CA 92121									
Sche	dule A	Constructive Ownership		-				_			
		box b , enter the name, add			tification n	umber (if a	ny) of the pe	rson(s	, wnose	;	
		interest you constructively	own. S	r							
		a X Owns a direct interest		b <u>L</u>	Owns a	constructive	interest		To	heck if	Check if
		Name		Address			Identification nun	nber (if an	y) f	oreign	direct
										person	partner
										-+	
Sche	dule A-1	Certain Partners of Foreig	ın Part	nership (see instruct	ions)				4	1	
-4.TTAN (146-0)		.,			<u> </u>						Check if
		Name		Address			Identificatio	n number	(if any)		foreign person
Sche	dule A-2	Foreign Partners of Section	on 721		instruction						
	of foreign	Address		Country of organization	U.S. tax identificatio		Check if related to	,	Percentag	e interes	t
p	artner			(if any)	(if ar		U.S. transferor	Ci	apital	Pro	ofits
								ļ	%		<u>%</u>
	<u> </u>							<u> </u>	%	L	<u> %</u>
		have any other foreign person as a dir					· · · · · · · · · · · · · · · · · · ·	Ye			No
Sche	dule A-3	Affiliation Schedule. List a direct interest or indirect			mestic) in	wnich the	roreign partn	ership	owns		
		a direct interest of indirecti	y OWIIS	a 1070 III.GIESI.							Check if
		Name		Address			EIN (if any)		Total ordin income or		foreign partner-
											ship
								_			+
									Foi	rm 888	5 (2019)
									1 01	5000	- (2010)

SCHEDULE O (Form 8865)

(Rev. December 2018)
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 transfero									Filer's identi			
N					FOUNDA			Lem es	33-0	37877		/ /
Name of foreign p	artnersnip EM	R CAP.	LTAL R	ESOURC	ES FUND	TTT '		EIN (if any) 98-148	0024	Kererence	ם חשמת עו פ	er (see instr)
1a is the partu	nership a section 7	21(c) partner	rshin (as def	ined in Temp	nrary Regulations	s section 1					Yes	X No
	s the gain deferral									Г	Yes	No
	tangible property t			-								
time therea	ifter, a platform co	ntribution as	defined in R	egulations se	ction 1.482-7(c)	(1)?					Yes	X No
Part I T	ransfers Reportabl	le Under Sec	tion 6038B									
Type of property	(a) Date of transfer	(b) Description of property	(c Fair mark on date o	et value	(d) Cost or othe basis	r		(e) ry period	(f) Section 704 allocation me		Gain re	(g) ecognized ransfer
Cash	11/25/19		204,	255.								
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			204	,255.								
	ansferor's percenta ormation Required		n the partne	rship: (a) Bef	ore the transfer	.0	000	%	(b) After	the transfe	r	6800 %
Part II Di	ispositions Report	able Under S	Section 6038	BB								
(a) Type of property	(b) Date of original transfer		(c) ate of position	(d) Manner of disposition	(e) Gair recognize partners	ed by	red red	(f) preciation ecapture cognized partnership	(g) Gain alloca to partne		Depre recaptur	(h) eciation e allocated artner
Part III Is	any transfer repor	ted on this s	chedule subj	ect to gain re	cognition under	section 90	4(f)(3) o	r section 904(f)(5)(F)?	🕨	Yes	X No
LHA For Paperv	vork Reduction Act	Notice, see	the Instruct	ions for Forn	n 8865.				8	Schedule O	(Form 88	365) 12-2018

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

beginning JAN 1 , 2019, and ending DEC 31 2019

Name of person filing this return				1	s identificat 3 – 0 3 7		ī
ORANGE COUNTY COMMUN							
Filer's address (if you aren't filing this form with y	our tax return)	A Category of	filer (see Categorie			and check app	olicable box(es)):
		n Filer's tax y			X	4	
4,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		B Filer's tax yo	JUL	<u>1 ,201</u>	- ,	ing JUN	30,2020
C Filer's share of liabilities; Nonrecourse \$	Qualified non	recourse financin	g \$		Other	\$	
D If filer is a member of a consolidated group but	<u>it not the parent, enter the following</u>	j information abo	ut the parent;	т			
Name				EIN			
Address							
E Check if any excepted specified foreign financi		See instructions					
F Information about certain other partners (see	instructions)				T		
(1) Name	(2) Address		(3) Identificati	on number		Check applica	1
(1) Name	(z) Address		(o) jadrianouti	on maniba	Category 1	Category 2	Constructive owner
G1 Name and address of foreign partnership					2(a) EIN		
LSF X U.S. HOLDINGS, L	.P.					<u>-1473</u>	
					1 ' '	rence ID nu	ımber
WASHINGTON MALL, SUITE		EET			3612		
HAMILTON, BERMUDA HM 1	1				1		se laws organized
					BERMU		
4 Date of organization 5 Principal place of business	6 Principal business activity code number	7 Principal busi activity		8a curre	tional ncy		ange rate nstructions)
04/27/2018BERMUDA	525990	FIN VEH	ICLES	USD		1	.000000
H Provide the following information for the forei	gn partnership's tax year:						
1 Name, address, and identification number of a	gent (if any) in the United States	2 Check if the	e foreign partne	rship must fi	e:	_	
		For	rm 1042	Form 88	04 X] Form 106	65
		Service Cer	nter where Forn	n 1065 is filed	i:		
3 Name and address of foreign partnership's ag	ent in country of organization, if any	y 4 Name and ad partnership, a	ldress of person(s) and the location of	with custody of such books and	the books and records, if dif	records of the ferent	e foreign
CODAN SERVICES LIMITED							
2 CHURCH STREET							
HAMILTON, BERMUDA HM	11						
5 During the tax year, did the foreign partners	hip pay or accrue any interest or ro	yalty for which th	e deduction is r	not			
allowed under section 267A? See instruction	ns				🕨	Yes	X No
If "Yes," enter the total amount of the disallo	wed deductions	.,,,,,,,			>	\$ <u></u>	
6 Is the partnership a section 721(c) partnersh	hip, as defined in Temporary Regula	ations section 1.7	21(c)-1T(b)(14)?		Yes	X No
7 Were any special allocations made by the fo	reign partnership?					Yes	X No
8 Enter the number of Forms 8858, Information	on Return of U.S. Persons With Res	spect to Foreign D	isregarded Enti	ties			
(FDEs) and Foreign Branches (FBs), attache							
9 How is this partnership classified under the	law of the country in which it's orga	anized?			LTD P	ARTNE	RSHIP
10 a Does the filer have an interest in the foreign	partnership, or an interest indirectl	y through the for	eign partnershi <mark>r</mark>	, that's a			
separate unit under Reg. 1.1503(d)-1(b)(4)	or part of a combined separate unit	under Reg. 1.150	03(d)-1(b)(4)(ii)? If "No,"			
skip question 10b						Yes	X No
b If "Yes," does the separate unit or combined	separate unit have a dual consolida	ated loss, as defin	ed in				
					▶	Yes	No
11 Does this partnership meet both of the follo)				
1. The partnership's total receipts for the ta							
2. The value of the partnership's total asset	• • •	than \$1 million.				Yes	No No
If "Yes," don't complete Schedules L, M-1, a			J				_
LHA For Privacy Act and Paperwork Reductio	n Act Notice, see the separate inst	tructions.					Form 8865 (2019)

Form 886	65 (20)	19)	ORANG	E CC	ALIMOC	COV	<u>1MUN</u>	TTY FC	T.T.VGMO	ON				<u> </u>	<u>3-(</u>	<u> 13/8</u>	<u>//8</u>	 	age 2
12 a	Is the	filer of t	this Form 8	865 clai	ming a fore	ign-der	rived inta	ingible incon	ne deduction (under secti	on 250) with	respec	t to		_		1		
			listed on So											🕨	▶	Yes	I	X	No
									changes, or o										
				-					ed in its comp										
	-		ie (FDDEI)						perty to or by						_				
		-	in its comp	_	. CEDDEL										•				
			•						ed to or by the					•	_	***************************************			
			computati											🕨	>				
			•						esult of transf						-				
	the pa	rtnershi	ip or of rece	eiving a	distribution	from t	he partn	ership						>	.				
14	At any	time di	uring the ta	x year w	ere any tra	nsfers l	between	the partners	hip and its pa	tners subje	ct to the discl	losure			_				
	•		-		tion 1.707-8	3?								🕨	▶	Yes	l	X	No
									tween the par										
			;		_			•	attach a state							Yes	1	X	No
									it. See instruc bility where s			 hv a n		 thin		168	l	<u> </u>	NO
		,	•		•	•		•	attach a statei	_									
	-			•		•		•	partnership, a			-		, •	▶ [Yes	ſ	X	No
Sign Here if You're F	Only I	Jnder pe	nalties of perj	jury, I dec	lare that I hav	e examir	ned this re	turn, including	accompanying s nited liability con	chedules and	statements, and	to the l	best of my						
This Form	١	3011001, 0	ina compioso.		or, or p. op.a. o	(01.101 2	nan gona	ar para la or mi	incoa inability con	,pa.,,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					I k			
Separately Not With Y	our	_																	
Tax Return	Return. Signature of general partner or limited liability company member Print/Type preparer's name Preparer's signature Date														PTIN	Date			
Paid	id eparer PATRICIA J. MAYER											Chec self-e	mploy	if ed	P00	1 2 2	64	3	
-	reparer Se PATRICIA J. MAYER Firm's name MOSS ADAMS LLP Firm's lame MOSS ADAMS LLP													$\frac{1-00}{1-01}$			<u></u>		
Use	se Firm's name MOSS ADAMS LLP Firm's										Phone no								
Only			DIEGŌ		9212					***************************************									
Sched	dule /	\				-		_	iterest. C				-			-			
									expayer ide	ntification	n number (if any) of the	per	son(s) who	se		
				-		-	own. S	ee instruc	tions.										
			a X	Owns	a direct inte	erest			<u>b</u>	Owr	ns a construct	tive int I	erest				Check	if C	Check if
			Name						Address			lo	dentificatio	n numt	oer (if a	ıny)	foreig	m	direct
																	perso	" '	partner
						-												十	
Sched	iule /	V-1	Certai	n Part	ners of F	oreig	n Part	nership	(see instru	ctions)		·							
			Nama						Address				Identif	ication	numb	er (if any)			heck if foreign
			Name						Address				IGENIII	Cation	1101110	= (ii aiiy)			person
												<u> </u>						_	
0.1		T	F!	- D'		\	704	(a) Dantu -	valsis /s -	- i	iona\	<u> </u>	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~						
Sched			Foreig	n Part	ners of S	Section	on /21	(c) Partne	rsnip (se	e instruct	ions) . taxpayer					Percen	tage int	oraet	
Name or foreign Address organization identification number								heck if rela U.S. transt		(Capital	T	Profi	its					
								ν.	· uny	1	(ii diiy)						%		%
										1							%		%
Does the	partne	rship h	ave any oth	er foreig	n person a	s a dire	ct partn	er?						[Y	es/	<u> </u>		No
Sched			Affiliat	ion Sc	hedule.	List a	all parti	nerships (f	oreign or c	omestic)	in which th	he for	reign p	artne			}		
			a direc	t intere	est or ind	irectly	owns	a 10% int	erest.										
			9 ^{Name}			Ī			Address				EIN			Total or			Check if foreign partner-
STA	TEN	ENT	9 9 9										(if any)		+	income	or ioss		ship
													····		+				
						L								·····			Zorm 1	005	(2010)
																ı	OUIII (000	(2019)

910652 01-15-20

SCHEDULE O (Form 8865)

(Rev. December 2018)
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.

OMB No. 1545-1668

Name of transfero			10 11 11 11 11	JIGO 171 O.111		and the latest h		Filer's identi	fying nur	nber	
		COUN	TY COM	MUNIT	Y FOUNDATIO	N		33-0			
Name of foreign p					S, L.P.	EIN (ii	fany)				ber (see instr)
					•	98-	147	3941	3612	7	
1a Is the partr	ership a section 72	21(c) partne	rship (as de	fined in Tem _l	oorary Regulations secti	on 1.721(c)-1T(b)(1-	4))? S	ee instructions	[Yes	X No
b If "Yes," wa	s the gain deferral	method app	lied to avoid	I the recognit	ion of gain upon the cor	tribution of property	/?		[Yes	No
					to be, at the time of the						
					ection 1.482-7(c)(1)? .				<u>L</u>	Yes	X No
Part I Tr	ansfers Reportabl	e Under Se	ction 6038B		T	· r · · · · · · · · · · · · · · · · · · ·					
Type of property	(a) Date of transfer	(b) Description of property	Fair mar	(c) ket value of transfer	(d) Cost or other basis	(e) Recovery period		(f) Section 704 allocation me			(g) recognized transfer
Cash	12/31/19		774	,439.							
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)							_				
3601011 197(1)(9)											
Other											
property											
Totals				1,439.							
	ansferor's percenta				fore the transfer	.0800 %		(b) After	the trans	fer •	0803 %
Supplemental Info	ormation Required	To Be Rep	orted (see i	nstructions):							
,											
Part II Di	spositions Report	able Under	Section 603	8B							
(a) Type of property	(b) Date of original transfer		(c) Date of position	(d) Manner of disposition		(f) Depreciation recapture recognized by partnershi		(g) Gain alloc to partn		recaptu	(h) preciation pre allocated partner
									,		
Destro deposit de portos										<u></u>	
	any transfer report				ecognition under section	1 904(f)(3) or section	n 904(Enhadula	O /Form 9	X No

910661 04-01-19

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

beginning JAN 1 , 2019, and ending DEC , 2019 OMB No. 1545-1668

Name of person filing this return Filer's identification number 33-0378778 ORANGE COUNTY COMMUNITY FOUNDATION Filer's address (if you aren't filing this form with your tax return) A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): 3 X JUL 2019 and ending JUN 30, 2020 beginning Qualified nonrecourse financing \$ C Filer's share of liabilities; Nonrecourse \$ Other \$ 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 Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Category 1 Category 2 Constructive owner 2(a) EIN (if any) G1 Name and address of foreign partnership KESTREL COAL GROUP PTY LTD. 98-1428342 2(b) Reference ID number LEVEL 22, 10 EAGLE STREET BRISBANE QUEENSLAND, AUSTRALIA 4000 3 Country under whose laws organized AUSTRALIA 7 Principal business activity 4 Date of organization 5 Principal place of business 6 Principal business activity code number 8a Functiona currency 8b Exchange rate (see instructions) 02/26/2018 AUSTRALIA 523900 INVESTMENT USD 1.000000 H Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: X Form 1065 Form 1042 Form 8804 Service Center where Form 1065 is filed: A Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different 3 Name and address of foreign partnership's agent in country of organization, if any During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not X No allowed under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Temporary Regulations section 1.721(c)-1T(b)(14)? X No Yes X No Were any special allocations made by the foreign partnership? Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (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? 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," X No skip question 10b

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

1. The partnership's total receipts for the tax year were less than \$250,000.

11 Does this partnership meet both of the following requirements?

If "Yes," don't complete Schedules L, M-1, and M-2.

b If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Reg. 1.1503(d)-1(b)(5)(ii)?

2. The value of the partnership's total assets at the end of the tax year was less than \$1 million.

Form 8865 (2019)

Form 88	65 (2019)	ORANGE COUNTY CO	MMUN	ITY FOUNDATIO	N				33.	-037	877	8	Page 2
12 a		this Form 8865 claiming a foreign-de		,		,	•					X	No
										Ye	S	Δ	NO
b		the amount of gross income derived											
		tions with or by the foreign partnersh						om					
	eligible incon	ne (FDDEI) the amount of gross income derived											
C	•	1 to 1 temper			- '	•							
i				ulasa nya ildad ta ay hu tha f				• • • • • • • • • • • • • • • • • • • •					
d		the amount of gross income derived											
40		s computation of FDDEI									************		
13		nber of foreign partners subject to se											
14		ip or of receiving a distribution from uring the tax year were any transfers											
14	-				-					☐ Ye		X	No
15 a	•	ny transfers of property or money wi	hin a 2-14	ear period between the partn	orchin and an	v of ite na	rtnare			L ''		21	NO
Ισα		quire disclosure under Regs. 1.703-3											
		lue of each transfer, and an explanat								☐ Ye	ı e	X	No
b		ership assume a liability or receive p								''	,,,		160
U	•	od of transferring the property to the		, ,	,								
	• •	r value of each transfer, the debt ass	•	'			-	•	•	☐ Ye	25	X	No
Sign Here	Only Under pe	enalties of perjury, I declare that I have exam	ined this re	turn, including accompanying sch	edules and state	ments, and	to the best	of my know		e and belie	f, it is	rue,	110
if You're F This Form		and complete. Declaration of preparer (other	than gener	al partner or limited liability compa	any member) is b	ased on all	informatio	of which p	orepar	er has any	knowl	edge.	
Separatel	y and												
Not With ` Tax Retur						Date	e						
Paid	Print/Typ		Check	\neg	PTIN								
	PATR	self-empl	oyed	P0	018	3864	3						
Use	parer										189	318	
Only	Firm's a	ddress >4747 EXECUTI	VE D	R SUITE 1300)			ne no.8		-627	-14	00	
Office	SAN	DIEGO, CA 92121											
Sche	dule A	Constructive Ownership	of Parti	nership Interest. Ch	eck the box	xes that	apply	to the fi	ler.	If you o	chec	k	
		box b , enter the name, ad-	dress, a	nd U.S. taxpayer iden	tification nu	ımber (it	f any) c	of the pe	erso	n(s) wh	ose		
		interest you constructively	own. S	ee instructions.									
		a X Owns a direct interest		b	Owns a	constructi	ve intere	st					
		Name		Address			Idont	ification nu	mhar	(if any)		eck if reign	Check if direct
	.,	Name		Address			- Ident	mcation nu	IIIDGI I	(ii aiiy)		erson	partner
				:									
Sche	dule A-1	Certain Partners of Forei	gn Part	nership (see instruct	ions)								
		Name		Address		1		Identification	on nu	mber (if an	v)		Check if foreign
													person
													
	dule A-2	Foreign Partners of Secti	on 721	c) Partnership (see	instructions U.S. taxp		T					. int :	
	me or foreign Address organization identification number Che										entage	interest	e
				(if any)	(if an	y)			+	Capital		Pro	
								<u> </u>	\bot		%		<u>%</u>
D									ㅗ	1 , ,	%		<u> %</u>
		ave any other foreign person as a di Affiliation Schedule. List			moetie) is :	ubioh +h	o forci	an nart	1000	Yes	200		No
Scrie	dule A-3	a direct interest or indirect			mesuc) III v	willer th	e iorei	yıı partı	1612	iib ow	115		·•
		Name		Address				EIN			l ordina		Check if foreign partner-
				7.00			(1	f any)	_	incor	ne or lo	DSS	ship
									_				<u> </u>
									I				1

910652 01-15-20

Form 8865 (2019)

SCHEDULE O (Form 8865)

(Rev. December 2018)
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 transfero		COINT	W CONSTRUCT		.	Filer's identify	
Name of foreign p			COAL GROUP	Y FOUNDATION PTY LTD.	EIN (if any) 98-142	F	Reference ID number (see instr
b If "Yes," was2 Was any interest	s the gain deferral tangible property t	method appli ransferred co ntribution as	ied to avoid the recogni insidered or anticipated defined in Regulations :	porary Regulations section of gain upon the cont to be, at the time of the tr section 1.482-7(c)(1)?	n 1.721(c)-1T(b)(14))? S ribution of property? ansfer or at any	ee instructions	Yes No
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 period	(f) Section 704(c allocation meth	
Cash	12/01/19		593,004.				
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			593,004.				
			n the partnership: (a) Be rted (see instructions):		0000 %	(b) After th	ne transfer . 2300 %
	ispositions Report				1 0		
(a) Type of property	(b) Date of original transfer	Da	(c) (d) tte of Manner of osition disposition		(f) Depreciation recapture recognized by partnership	(g) Gain allocate to partner	ed (h) Depreciation recapture allocated to partner
			chedule subject to gain to the Instructions for For	recognition under section	904(f)(3) or section 904(Yes X No hedule O (Form 8865) 12-2018

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

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

31,2019 beginning JAN 1 . 2019, and ending DEC

Name of person filing this return Filer's identification number 33-0378778 ORANGE COUNTY COMMUNITY FOUNDATION 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 X JUL 1 2019 , and ending JUN 30, 2020 beginning C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ 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 Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Category 1 Category 2 Constructive owner 2(a) EIN (if any) G1 Name and address of foreign partnership LONE STAR FUND XI, L.P. 98-1441228 2(b) Reference ID number WASHINGTON MALL, SUITE 304 7 REID STREET 36398 3 Country under whose laws organized HAMILTON, BERMUDA HM 11 BERMUDA 8a Functional currency 4 Date of organization 6 Principal business activity code number 7 Principal business activity 8b Exchange rate (see instructions) 5 Principal place 1.000000 06/19/2018BERMUDA 525990 FIN VEHICLES USD H Provide the following information for the foreign partnership's tax year: 2 Check if the foreign partnership must file: 1 Name, address, and identification number of agent (if any) in the United States X Form 1065 Form 1042 Form 8804 Service Center where Form 1065 is filed: Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different 3 Name and address of foreign partnership's agent in country of organization, if any CLARENDON HOUSE 2 CHURCH STREET HAMILTON, BERMUDA HM11 5 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not X No allowed under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions X No 6 Is the partnership a section 721(c) partnership, as defined in Temporary Regulations section 1.721(c)-1T(b)(14)? Yes Were any special allocations made by the foreign partnership? X Yes Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (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? 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," X No skip question 10b **b** If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Reg. 1.1503(d)-1(b)(5)(ii)? 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 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.

910651 01-15-20

Form 8865 (2019)

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form 886	55 (2019)	ORANGE CC	DONLA COW	MUN.	TTY FOUNDATI	ON				3-03/	5//	5 1	Page 2
12 a	Is the filer of	this Form 8865 clair	ming a foreign-deri	ved inta	ingible income deduction (under s	ection 2	50) with resp	ect to				1
	-	listed on Schedule I								► Ye	S	X	No
		_			es, leases, exchanges, or o								
		Charles and marks			e filer included in its comp					_			
	eligible incor	, , ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,											
			4 EDDEI		cense of property to or by				1				
		in its computation of			vices provided to or by the								
	included in it	s computation of FD	DEI							—			
					(c)(8) as a result of transf ership					•			
					the partnership and its pa								
	•	s of Regulations sect	****							► Ye	s	X	No
15 a	Were there a	ny transfers of prope	erty or money with	in a 2-ye	ear period between the par	tnershi	p and an	y of its partn	ers				
		•	-		-6? If "Yes," attach a state				s, the			[**]	1
					tax treatment. See instruc					► Y€	S	X	No
	•				bject to a liability where s		-	-	-				
		-			ip? If "Yes," attach a state							X	No
Sign Here					aken by the partnership, a turn, including accompanying s					Y€ edge and belie			IVO
if You're Fi This Form	iling correct,	and complete. Declaration	on of preparer (other th	an gener	al partner or limited liability con	ipany me	mber) is b	ased on all info	rmation of which pro	parer has any	knowled	ige.	
Separately													
Not With Y Tax Return		ignature of general partn	er or limited liability of	ompany n	nember				······································		Date		
Paid	Print/Typ	e preparer's name		Prepai	rer's signature			Date	Check	if PTIN			
Prepa	PATE	RICIA J. M	IAYER						self-employ	ed P0	018	864	:3
Use	Firm's ı	name MOSS	ADAMS LI	P					Firm's EIN	91-0	189	318	i
Only	Firm's a	address ►4747	EXECUTIV	E D	R SUITE 130	0			Phone no.85	8-627	-14	00	
		DIEGO, CA											
Sched	dule A		•		nership Interest. C					-			
					nd U.S. taxpayer ide	ntifica	ition nu	ımber (if a	ny) of the per	son(s) wh	ose		
			-	wn. S	ee instructions.								
		a X Owns a	a direct interest		<u> </u>		Owns a	constructive T	interest		Che	ale if	Check if
		Name			Address				Identification num	ber (if any)	fore	ign	direct
										·····	pers	son	partner
											+-	\dashv	<u></u>
Scher	iule A-1	Certain Partr	ners of Foreign	n Part	nership (see instru	ctions	}						
lise monotorio consulo			1									T	Check if
		Name			Address				Identification	number (if an	/)		foreign person
												\neg	<u> </u>
Sched	dule A-2	Foreign Parti	ners of Sectio	n 721	(c) Partnership (se	e instr	uction	s)					
	f foreign		Address		Country of organization	ide	U.S. taxı entification		Check if related to	Perc	entage i	nterest	
par	tner				(if any)		(if an		U.S. transferor	Capital		Pro	fits
											%		<u>%</u>
										<u> </u>	%		%
		nave any other foreig							<u>,,</u> [Yes		Ш	No
Sched	lule A-3				nerships (foreign or c	omes	tic) in v	which the	roreign partne	ership ow	าร		
		a unect intere	or mairectly	OWNS	a 10% interest.				· · · · · · · · · · · · · · · · · · ·				Check if
am.		r 1 ^{Name}			Address				EIN (if any)		l ordinar		foreign partner-
STA	TEMEN	r. TA							2/	-			ship
										-			+
			l.								Form	goer	(2019)
											I UIIII	0000	(2013)

910652 01-15-20

SCHEDULE 0 (Form 8865)

(Rev. December 2018) 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 transfero	r					Filer's identifyin	
				Y FOUNDATION		33-037	
Name of foreign p	artnership LO	NE ST.	AR FUND XI,	L.P.	EIN (if any		ference ID number (see instr)
					98-14		398
			· ·	porary Regulations sectio			
				tion of gain upon the cont			Yes No
				to be, at the time of the treection 1.482-7(c)(1)?			Yes X No
	ansfers Reportabl						165 22 110
	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Type of property	Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	Recovery period	Section 704(c) allocation method	Gain recognized
Cash	12/01/19		166,335.				
Stock, notes							
receivable and payable,							
and other							
securities							
Inventory							
involutory							
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							
			466 005				
Totals			166,335.	<u> </u>	0420	# N 16 #	
**************************************			in the partnership; (a) Be orted (see instructions);		0420 %	(b) After the	transfer . 0400 %
onbhieuiciirai iiiic	mation Required	io de veh	orten (see man actions).				
				· · · · · · · · · · · · · · · · · · ·	·····		
Part II Di	spositions Reporta	ble Under	Section 6038B				
(a)	(b)		(c) (d)	(e)	(f)	(g)	(h)
Type of property	Date of original		Date of Manner of position disposition		Depreciation recapture	Gain allocated to partner	Depreciation recapture allocated
	transfer			partnership	recognized by partnership		to partner
						<u> </u>	
			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		201(0)(0) :: 22	100000	<u> </u>
			chedule subject to gain r the Instructions for For	ecognition under section	904(T)(3) or section 904		Yes X No

8865

If "Yes," don't complete Schedules L, M-1, and M-2.

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

. 2019 31

OMB No. 1545-1668

Department of the Treasury beginning JAN 1 , 2019, and ending DEC Internal Revenue Service Filer's identification number Name of person filing this return ORANGE COUNTY COMMUNITY FOUNDATION Filer's address (if you aren't filing this form with your tax return)

ODANGE COINING COMM				33-037	8778	
Filer's address (if you aren't filing this form wi		A Category of	of filer (see Categories of Filers in the	e instructions	and check app	olicable box(es)):
(,	1	, -	X	4	. "
		B Filer's tax			ina JUN	30 2020
C Filer's share of liabilities: Nonrecourse \$	Qualified nor	recourse financi		Other	····×	<u> </u>
D If filer is a member of a consolidated group			<u> </u>			
Name		•	EIN			
Address						
E Check if any excepted specified foreign final	ancial assets are reported on this form	. See instructions	3			
F Information about certain other partners (s						
				(4)	Check applica	able box(es)
(1) Name	(2) Address		(3) Identification number	Category 1	Category 2	Constructive owner
G1 Name and address of foreign partnership				2(a) EIN	(if any)	
PATRIA-PRIVATE EQUITY	FUND VI, L.P.			98	-1411	655
				2(b) Refe	rence ID nu	mber
199 BAY STREET, COMME	ERCE COURT WEST					
TORONTO, CANADA M5L 1	L89			3 Country	under who	se laws organized
				CANAD	A	
4 Date of 5 Principal place of business	6 Principal business activity code number	7 Principal bus	siness 8a Fund	etional ency	8b (see i	ange rate nstructions)
12/07/2017BRAZIL	523900	INVESTM	ENT USD		1	.000000
H Provide the following information for the fo	oreign partnership's tax year:					
1 Name, address, and identification number of	of agent (if any) in the United States	Fo	ne foreign partnership must fi orm 1042 Form 88 onter where Form 1065 is file	304 X	Form 100	§5
		E-FI		u.		
3 Name and address of foreign partnership's	agent in country of organization, if ar	Name and a	ddress of person(s) with custody o and the location of such books an	f the books and	records of th	e foreign
•	. ag	-y particionip,	and the location of Socii books an	a 1000 as, ii aii	ia on	
5 During the tax year, did the foreign partn	ership pay or accrue any interest or ro	cyalty for which t	he deduction is not			
allowed under section 267A? See instruc					Yes	X No
If "Yes," enter the total amount of the disa	allowed deductions				\$	
6 Is the partnership a section 721(c) partnership					Yes	X No
7 Were any special allocations made by the	e foreign partnership?				X Yes	No No
8 Enter the number of Forms 8858, Inform	ation Return of U.S. Persons With Re	spect to Foreign I	Disregarded Entities			
(FDEs) and Foreign Branches (FBs), attac	ched to this return. See instructions					
9 How is this partnership classified under t	the law of the country in which it's org	janized?		PARTN	ERSHI	P
10 a Does the filer have an interest in the fore	ign partnership, or an interest indirect	ly through the fo	reign partnership, that's a			
separate unit under Reg. 1.1503(d)-1(b)((4) or part of a combined separate uni	t under Reg. 1.15	03(d)-1(b)(4)(ii)? If "No,"			
skip question 10b					Yes Yes	X No
b If "Yes," does the separate unit or combin						
Reg. 1.1503(d)-1(b)(5)(ii)?			***************************************		Yes	No
11 Does this partnership meet both of the fo	ollowing requirements?)			
1. The partnership's total receipts for the						
2. The value of the partnership's total as	sets at the end of the tax year was les	s than \$1 million.	. }	>	Yes	No

LHA For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form 8865 (2019)

Form 886	65 (2019)	ORANGE COUNTY	Y COI	MUM.	ITY FOUNDATI	ON			3.	<u>3-0</u>	3787	78	Page 2
12 a	Is the filer of	this Form 8865 claiming a fo	oreign-dei	rived inta	ngible income deduction (under section :	250) with res	spect to				,	
									🕨	▶	Yes	X	No
		the amount of gross income											
		tions with or by the foreign p							_				
	eligible incon	ne (FDDEI)							🕨	-			
		the amount of gross income		from a lic	cense of property to or by	the foreign par	tnership that	the	_				
		in its computation of FDDEI							🏲	-			
		the amount of gross income							_				
		s computation of FDDEI							🕨	-			
		nber of foreign partners subj											
		ip or of receiving a distributi								-			
		uring the tax year were any to f Regulations section 1.70							_		Yes	Y	No
	•	ny transfers of property or m	• • • • • • • • • • • • • • • • • • • •		ar paried between the par					L	100	[23	_1 NO
		quire disclosure under Regs	-										
		lue of each transfer, and an								. [Yes	X	No
		ership assume a liability or r								<u> </u>	100		
	•	od of transferring the proper	•		•	-	-	•					
		r value of each transfer, the							•	• [Yes	X	No
Sign Here	Only Under pe	enalties of perjury, I declare that I t	nave exami	ned this ret	urn, including accompanying s	chedules and stat	ements, and to	the best of my					
if You're Fi This Form	iling correct,	and complete. Declaration of prepare	arer (other t	than genera	al partner or limited liability com	pany member) is	based on all in	formation of wh	ich pre	parer ha	as any kno	wiedge.	
Separately													
Not With Y Tax Return		gnature of general partner or limit	ed liability o	company m	ember							Date	
Paid	Print/Typ	e preparer's name		Prepar	er's signature		Date	Check] if F	PTIN		
Prepa	rer PATR	ICIA J. MAYE	R					self-e	mploye	эd	P001	.886	43
Use	Firm's r	name MOSS ADA	MS L	LР				Firm's Ell	V	91	-018	3931	8
Only	Firm's a	ddress ►4747 EXE	CUTI	VE DI	R SUITE 130	0		Phone no	.85	8-6	27-1	.400	
O y	SAN	DIEGO, CA 92:											
Sched	iule A		-		n <mark>ership Interest.</mark> C								
		•	•		nd U.S. taxpayer ide	ntification n	umber (if	any) of the	pers	son(s) whos	е	
		interest you constru	ctively	own, S	ee instructions.								
		a X Owns a direct i	nterest		b	Owns a	constructive	e interest					r
		Name			Address			Identification	numb	oer (if ar		Check if foreign	Check if direct
												person	partner
(for the strategic)		0		n .			<u></u>						
Sched	iule A-1	Certain Partners of	r Foreig	in Parti	nership (see instru	ctions)							Check if
		Name			Address			Identif	cation	number	r (if any)		foreign
													person
Cabas	lule A-2	Foreign Partners o	f Conti	n 701/	a) Bartnarahin (co	e instruction							
		Foreign Partifers o	i Secu) / 2	Country of	U.S. ta:		To	1		Percents	age interes	
Name of part		Address			organization (if any)	identificatio		Check if rela U.S. transf		С	apital		rofits
					(ii diriy)	(11 2	,	1 6			·	+	%
													<u>/^</u> %
Does the	nartnerehin h	I	n ac a dire	ect partne	l	<u>i</u>				Ye		<u> </u>	□ No
	lule A-3				nerships (foreign or d	omestic) in	which the	foreign p	∟ artne				_ IVU
Jonet		a direct interest or in				.c.1100010j 111	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			. 0. 110	5,7110		
				-	· · · · · · · · · · · · · · · · · · ·			EIN		T	Total ord	dinary	Check it
		Name			Address			(if any)			income o		foreign partner- ship
PRIV.	ATE EO	UITY VI FUNDO)	AV.	CIDADE JARDI	м, 803				+			X
					PAULO, BRAZI		3 00			+	,		
			<u></u>			-					F	orm 886	5 (2019)

910652 01-15-20

SCHEDULE 0 (Form 8865)

(Rev. December 2018) 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 transfero	r								Filer's identi	fying num	ber	
			TY COM							37877	18	
Name of foreign p	artnership PA	TRIA-	PRIVATI	E EQU	ITY FU	ND VI	, L.	EIN (if any		Referenc	e ID numl	er (see instr)
								98-14	11655			
1a Is the partr	ership a section 72	21(c) partne	rship (as defir	ned in Tem _l	porary Regula	tions sectio	n 1.721(c)-	-1T(b)(14))?	See instructions	: <u> </u>	Yes	X No
b If "Yes," wa	s the gain deferral	method app	lied to avoid t	he recognit	ion of gain up	on the con	tribution of	property?		L	Yes	No
	tangible property ti									_	_	
	ifter, a platform cor			gulations s	ection 1.482-	7(c)(1)?				L	Yes	X No
Part I Ti	ansfers Reportabl	e Under Se	ction 6038B		T		Υ					
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair marke on date of t		(d Cost or bas	other		(e) ery period	(f) Section 704 allocation me			(g) ecognized transfer
Cash	12/31/19		111,	723.								
Stock, notes												
receivable			·									
and payable, and other												
securities												
Inventory												
Inventory												
Tangible					ļ		-					
property used in trade							-					
or business							-					
Intangible							 					
property							 					·
described in							-	· · · · · · · · · · · · · · · · · · ·				
section 197(f)(9)												
Intangible							-					
property, other												
than intangible property							<u> </u>					
described in section 197(f)(9)												
36011011 197 (1)(9)												
Other												
property												
Totals			111	,723.								
3 Enter the tr	ansferor's percenta	age interest	in the partners	ship: (a) Be	fore the trans	fer •	2184	%	(b) After	the transfe	er .	2050 %
Supplemental Inf	ormation Required	To Be Rep	orted (see ins	tructions):								
												
Part II Di	spositions Report	nhia lindar	Santian 6029E	,								
(a)	(b)	anie oliuel	(c)	(d)		(e)	l	/f\	(g)	Т		<i>n</i> .)
Type of	Date of		ate of	Manner of		Gain	De	(f) epreciation ecapture	Gain alloc			(h) eciation
property	original transfer	dis	position	disposition		gnized by rtnership	re	ecognized partnership	to partn	er		e allocated partner
***************************************							-51	·			······································	
Part III is	any transfer report	ted on this s	schedule subje	ct to gain r	ecognition un	der section	904(f)(3) o	or section 90	4(f)(5)(F)?		Yes	X No
I HA For Daneru	ork Reduction Act	Notice se	e the Instruction	one for For	m 8865					Schedule () /Form 8	865) 12-2018

FORM 8865	AFFILIATION SCHEDULE		STATEMEN	Т 9
NAME	ADDRESS	IDENTIFYING NUMBER	1.7	EIGN
LONE STAR CAPITAL INVESTME	33 RUE DU PUITS ROMAIN	98-0397144		x
	BERTRANGE, LUXEMBOURG L-80 WASHINGTON MALL, 7 REID ST BERMUDA HM 11	98-1324330		X
LSF10 FLAVUM INVESTMENTS	WASHINGTON MALL, 7 REID ST	98-1307409		х
LSF10 XL BIDCO S.C.A.	BERMUDA HM 11 2, RUE DE BITBOURG	98-1376442		х
LSF10 XL INVESTMENTS	LUXEMBOURG L-1273 WASHINGTON MALL, 7 REID ST BERMUDA HM 11	98-1363439		x
LSF ARGENTINA HOLDINGS	44 ESPLANADE			х
LSF10 ARGENTINA SUPER	ST. HELIER JE4 9WG, JERSEY 7 REID STREET			х
LSF10 SUMMERTIME HOLDINGS,	HAMILTON, BERMUDA HM 11 7 REID STREET	98-1455689		х
LONE STAR GLOBAL HOLDINGS	HAMILTON, BERMUDA HM 11 WASHINGTON MALL, 7 REID ST	98-1362534		Х
LSF10 ROSE HOLDINGS	BERMUDA HM 11 7 REID STREET HAMILTON, BERMUDA HM 11			Х
LSF SUPER PACIFIC HOLDINGS	WASHINGTON MALL, 7 REID ST BERMUDA HM 11	•		x
LSF10 WOLVERINE INVESTMENT	WASHINGTON MALL, 7 REID ST			х
LSF10 WOLVERINE	BERMUDA HM 11 33 RUE DU PUITS ROMAIN			х
LSF10 CEDAR SUPER HOLDINGS	LUXEMBOURG L-8070 WASHINGTON MALL, 7 REID ST			Х
LSF10 CEDAR HOLDINGS,	BERMUDA HM 11 WASHINGTON MALL, 7 REID ST			x
LSF10 CEDAR GUARANTEE	BERMUDA HM 11 WASHINGTON MALL, 7 REID ST			x
LSF10 CEDAR INVESTMENTS,	BERMUDA HM 11 WASHINGTON MALL, 7 REID ST	98-1350816		x
LSF10 MORTGAGE	BERMUDA HM 11 WASHINGTON MALL, 7 REID ST	32-0507762		
HOLDINGS,	BERMUDA HM 11			

184 STATEMENT(S) 9 2019.05091 ORANGE COUNTY COMMUNITY F 37736__1

ORANGE COUNTY COMMUN		33-0378778	
LSF10 WHOLE LOAN INVESTMEN	WASHINGTON MALL, 7 REID ST	98-1362535	Х
	BERMUDA HM 11		
LSF10 REO GP, L.P.	2711 NORTH HASKELL AVENUE DALLAS, TX 75204	81-4077777	
LSF10 REO HOLDINGS, L.P.	2711 NORTH HASKELL AVENUE	37-1838923	
	DALLAS. TX 75204		

FORM 8865	AFFILIATION SCHEDULE		STATEMENT 10
NAME	ADDRESS	IDENTIFYING NUMBER	CK TOTAL IF ORDINARY FOR- INCOME EIGN OR (LOSS) P'SH
LSF11 MORTGAGE HOLDINGS	2711 NORTH HASKELL AVENUE	83-1970415	
LSF11 REO HOLDINGS, L.P.		83-2039282	
LONE STAR GLOBAL HOLDINGS	DALLAS, TX 75204 7 REID STREET		x
LONE STAR INTERNATIONAL	HAMILTON, BERMUDA HM 11 FITZWILLIAM COURT		X
LONE STAR CAPITAL	DUBLIN, IRELAND D02 YW24 33 RUE DU PUITS ROMAIN	98-0397144	х
TIVEDIME	BERTRANGE , LUXEMBOURG L-8		Λ

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.

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)	TOURS I
Name of transferor	Identifying number (see instructions)
ORANGE COUNTY COMMUNITY FOUNDATION	
	33-0378778
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	n? Yes X No
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))	
five or fewer domestic corporations?	
b Did the transferor remain in existence after the transfer? If not, list the controlling shareholder(s) and their identifying number(s).	
Triot, list the controlling state-holder(s) and their identifying flumber(s).	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corp	poration? X 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 X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as suc	h under section 367),
complete questions 3a through 3d.	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	Yes No
c Is the partner disposing of its entire interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market? Part II Transferee Foreign Corporation Information (see instructions)	Yes No
	For Identifying pumphon if any
4 Name of transferee (foreign corporation)	5a Identifying number, if any
WINDHAM RISK PREMIA (CAYMAN) FUND LTD.	98-1322351
6 Address (including country)	5b Reference ID number
UGLAND HOUSE	
GRAND CAYMAN, KY1-1104	
7 Country code of country of incorporation or organization	
CJ	
8 Foreign law characterization (see instructions)	
EXEMPTED COMPANY WITH LIMITED LIABILITY	ि., चि ⁻
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No Form 926 (Rev. 11-2018)
924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.	1 UHH 320 (NEV. 11-2010)

		TY COMMUNITY FOU			33-0.	378778 Page 2
	Regarding Tran	sfer of Property (see in	istructio	ns)		
Section A - Cash Type of property	(a) Date of	(b) Description of	Fair ma	(c) rket value on	(d) Cost or other	(e) Gain recognized on
Cash STMT 1:	transfer	property	date	of transfer	basis	transfer
10 Was cash the only pro If "Yes," skip the rema	operty transferred? ainder of Part III and (go to Part IV. In intangible property si				X Yes No
Type of property	(a) Date of transfer	(b) Description of property	Fair ma	(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	transies	property	date	Of transfer	Dasis	tansiei
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign corporation? If "Yes," go to line 12b b Was the transferor a c (including a branch th If "Yes," continue to li c Immediately after the transferee foreign corp If "Yes," continue to li d Enter the transferred I	lomestic corporation at is a foreign disregane 12c. If "No," skip transfer, was the donocration? ne 12d. If "No," skip oss amount included sfer property describ	that transferred substantially a arded entity) to a specified 10% lines 12c and 12d, and go to linestic corporation a U.S. share line 12d, and go to line 13. in gross income as required used in section 367(d)(4)?	all of the a 6-owned fo ne 13. eholder wi	ssets of a foreig preign corporation	n branch	Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subje	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property		(d) Arm's length pri on date of transf		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals			_		F	

14 a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?	Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
Part IV Additional Information Regarding Transfer of Property (see instructions) Part IV Additional Information Regarding Transfer of Property (see instructions) Info	b c d	reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) \$\$\sum_{\text{eq}}\$\$ 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
Part IV Additional Information Regarding Transfer of Property (see instructions) Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 1.999 % (b) After 2.248 %	Sup	plemental Part III Information Required To Be Reported (see instructions)		
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 1.999 % (b) After 2.248 % 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3)	S	EE STATEMENT 12		
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 1.999 % (b) After 2.248 % 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3)				
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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 1.999 % (b) After 2.248 % 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3)				
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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 1.999 % (b) After 2.248 % 17 Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3)				
(a) Before 1.999 % (b) After 2.248 % 17 Type of nonrecognition transaction (see instructions) ► IRC 351 TRANSACTION 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3)	Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3)		(a) Before 1.999 % (b) After 2.248 %		
a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 19 Did this transfer result from a change in entity classification? 10 Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) 10 Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) 10 Did a 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)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation				
b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 19 Did this transfer result from a change in entity classification? 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) 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) c 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)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			Vac	X No
c Recapture under section 1503(d)				
d Exchange gain under section 987				
Did this transfer result from a change in entity classification? 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) Yes X 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) c 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 No Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation				
20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions) 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) c 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)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation				
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) c 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)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		•		
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 property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	_U a		103	110
c 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)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	h	·	▶ ¢	
property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation			У Ф	
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	C		□ voc	No
Van V Na	21		L res	140
	Æ I	11	Ves	X No
Form 926 (Rev. 11-201		covered by section 367(e)(1)? See instructions		

924533 04-01-19

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.

OMB No. 1545-0026

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

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)			
Name of transferor		Identifying nu	mber (see instructions)
ORANGE COUNTY COMMUNITY FOUNDATION			
		33-037	8778
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	ration?	Ye:	x X No
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 36	8(c)) by		
five or fewer domestic corporations?		Yes	s No
b Did the transferor remain in existence after the transfer?			s No
If not, list the controlling shareholder(s) and their identifying number(s).			
	T		
Controlling shareholder		Identifying numb	er
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	t corporation?	Yes	No No
If not, list the name and employer identification number (EIN) of the parent corporation.	,		
Name of parent corporation	El	N of parent corpo	ration
d Have basis adjustments under section 367(a)(4) been made?		Yes	No No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under s	ection 367),	
complete questions 3a through 3d.		•	
a List the name and EIN of the transferor's partnership.			
	<u> </u>		
Name of partnership		EIN of partnersh	ip
BROADRIVER III, L.P.	82-264	11426	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	X No
c Is the partner disposing of its entire interest in the partnership?			X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable			
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)		5a Identifying nu	mber, if any
,		, ,	, ,
BROADRIVER III (IRELAND) DAC			
6 Address (including country)		5b Reference ID n	umber
32 MOLESWORTH STREET			
DUBLIN, IRELAND D02 Y512 IRELAND		BR0001	
7 Country code of country of incorporation or organization	-		
EI			
8 Foreign law characterization (see instructions)			
IRELAND			
9 Is the transferee foreign cornoration a controlled foreign cornoration?		X v	No.
9 Is the transferee foreign corporation a controlled foreign corporation? 924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.		X Yes	No 6 (Rev. 11-2018)

		TY COMMUNITY FOU			33-0	378778	Page 2
Part III Information	Regarding Tran	sfer of Property (see in	struction	ons)			
Section A - Cash							
Type of property	(a) Date of transfer	(b) Description of property	Fair ma	(c) arket value on of transfer	(d) Cost or other basis	Gain reco trai	e) ognized on nsfer
Cash	12/31/2019			220,903.			
10 Was cash the only pro If "Yes," skip the rema	inder of Part III and (go to Part IV. n intangible property si				X Yes	☐ No
Type of	(a) Date of	(b) Description of	Fair ma	(c) arket value on	(d) Cost or other	Gain reco	e) ognized on
property Stock and	transfer	property	date	of transfer	basis	traı	nsfer
securities							
Inventory			 				
Other property (not listed under another category)							
Property with							
built-in loss							
Totals			l				
Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 2 a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? Yes							
Section C - Intangible	Property Subjection	ect to Section 367(a)	I I			1	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of trans			(f) nclusion for f transfer
Property described n sec. 367(d)(4)							
Totals						orm 926 (F	lev. 11-2018)
					•	(r	,

Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
b c d	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) **Sample 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 Yes	No No No
	plemental Part III Information Required To Be Reported (see instructions)		
	EE STATEMENT 13		
		· · · · · · · · · · · · · · · · · · ·	
Par	t 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 % (b) After % TRC_3 F1_ MRANGA CM TON		
17	Type of nonrecognition transaction (see instructions) ► IRC 351 TRANSACTION		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		X No
	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)		X No
c	Recapture under section 1503(d)	Yes	
	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a		Yes	X No
	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)	> \$	
C	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 Yes	No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		TTT
	covered by section 367(e)(1)? See instructions	Yes Yes	X No
		Form 926 (Re	ev. 11-2018)

Form 926 (Rev. November 2018) Department of the Treasury Internal Revenue Service

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

OMB No. 1545-0026

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.

Part I U.S. Transferor Information (see instructions)				
Name of transferor	Iden	Identifying number (see instructions)		
ORANGE COUNTY COMMUNITY FOUNDATION				
		33	3-03787	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	tion?		Yes	X No
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(a	c)) by			
five or fewer domestic corporations?			Yes	No
b Did the transferor remain in existence after the transfer?			Yes	No
If not, list the controlling shareholder(s) and their identifying number(s).				
Controlling shareholder		Identifyir	ng number	
Controlling state folder				
				
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent c	orporation?)	Yes	No
If not, list the name and employer identification number (EIN) of the parent corporation.				
Name of parent corporation	E	IN of parer	nt corporati	on
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 actual transferor (but is not treated as s	uch under	section 367	7),	
complete questions 3a through 3d.				
a List the name and EIN of the transferor's partnership.				
Name of partnership		EIN of p	artnership	
·		•		
T GE V HG HOLDTNGG I D	98-14	72011		
LSF X US HOLDINGS, LP				X No
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			Yes	X No
c Is the partner disposing of its entire interest in the partnership?			Yes	A No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish		1		X No
securities market? Part II Transferee Foreign Corporation Information (see instructions)			Yes	T NO
Name of transferee (foreign corporation)		5a Identi	fying numb	er if any
4 Name of transferee (foreign corporation)		Ja luenti	iying numb	ci, ii aiiy
LSF10 WOLVERINE MIP WE S.A.R.L		35438	}	
6 Address (including country)			ence ID num	her
33 RUE DU PUITS ROMAIN		00 1101010	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
BERTRANGE, LUXEMBOURG L-8070				
7 Country code of country of incorporation or organization	1			
LU				
8 Foreign law characterization (see instructions)				
CORPORATION				
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No
924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Form 926 (F	Rev. 11-2018)

		TY COMMUNITY FOU		33-0	378778 Page 2	
Part III Information	Regarding Tran	sfer of Property (see in	structions)			
Section A - Cash						
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	12/31/2019		183,806.			
10 Was cash the only pro	inder of Part III and g				X Yes No	
10000000		n intangible property s			4.3	
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						
nventory						
Other property not listed under another category)						
Property with						
ouilt-in loss						
Totals				<u> </u>		
recognition agreement was filed? Yes						
Section C - Intangible	Property Subje	ct to Section 367(d)			,	
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length p on date of trans		(f) Income inclusion for year of transfer	
Property described n sec. 367(d)(4)						
Totals					orm 926 (Rev. 11-2018)	

Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
14 a 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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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	Yes Yes	No No No
15	Regulations section 1.367(d)-1(c)(3)(ii) 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)? Plemental Part III Information Required To Be Reported (see instructions)	Yes	□ No
	EE STATEMENT 14		
Pai	rt 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 0 3 5 % (b) After 0 3 5 %		
17	Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?		X No
20 a	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	X 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 No
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	X No
		Form 926 (Re	ev. 11-2018)

Return by a U.S. Transferor of Property to a Foreign Corporation • Go to www.irs.gov/Form926 for instructions and the latest information.

OMB No. 1545-0026

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

Part I U.S. Transferor Information (see instructions)				
Name of transferor	Identifyi	Identifying number (see instructions)		
ORANGE COUNTY COMMUNITY FOUNDATION				
		33-	03787	78
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpor	ration?		Yes	X No
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 366	B(c)) by			
five or fewer domestic corporations?			Yes	No
b Did the transferor remain in existence after the transfer?			Yes	No
If not, list the controlling shareholder(s) and their identifying number(s).				
		1.1		
Controlling shareholder		Identifying I	number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	corporation?		Yes	No
If not, list the name and employer identification number (EIN) of the parent corporation.			•	
	1			
Name of parent corporation	EII	N of parent c	orporati	on
d Have basis adjustments under section 367(a)(4) been made?		<u> </u>	Yes	No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under se	ection 367),		
complete questions 3a through 3d.				
a List the name and EIN of the transferor's partnership.				
	1	FINI C		
Name of partnership		EIN of parti	iersnip	
LSF X US HOLDINGS, LP	98-147	3941		
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		\square	Yes	X No
c Is the partner disposing of its entire interest in the partnership?		\Box	Yes	X No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estable				
securities market?			Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)				
4 Name of transferee (foreign corporation)		5a Identifyir	g numbe	er, if any
		-	_	
LSF10 SUMMERTIME INVESTMENTS, LTD.		98-145	1628	
6 Address (including country)		5b Reference	ID numl	ber
WASHINGTON MALL SUITE 304				
7 REID STREET, HAMILTON, BERMUDA HM11		LSF001		
7 Country code of country of incorporation or organization				
BD				
8 Foreign law characterization (see instructions)				
CORPORATION				
	, , , , , , , , , , , , , , , , , , , 		Yes	X No
92 Is the transferee foreign corporation a controlled foreign corporation? 924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.	****************	Foi		Rev. 11-2018)
on too, or or the mark of the property of the transport of the transport of the department of the transport		. 0		

Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) **Mas 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 Yes	No No No No
<u> </u>	plemental Part III Information Required To Be Reported (see instructions)		
	EE STATEMENT 15	,·	
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes	X No X No
b	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		□ No
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		X No

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

Name of transferor				
ivame of transferor	Identifyir	Identifying number (see instructions)		
ORANGE COUNTY COMMUNITY FOUNDATION				
		33-0	3787	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corp	oration?	📖	Yes	X No
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 3	68(c)) by			
five or fewer domestic corporations?		🖳	Yes	No
b Did the transferor remain in existence after the transfer?		Ш	Yes	No
If not, list the controlling shareholder(s) and their identifying number(s).				
Controlling shareholder	ld	entifying n	umber	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	nt corporation?		Yes	☐ No
Name of parent corporation	EIN o	f parent co	orporatio	on
Tallio of paront of poration				
d Have basis adjustments under section 367(a)(4) been made?	, L		Yes	No
d Have basis adjustments under section 367(a)(4) been made?			103	110
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated a	as such under sect	ion 367).		
complete questions 3a through 3d.		,,		
, ,				
a List the name and EIN of the transferor's partnership.	T	-		
, ,	E	IN of partn	ership	
a List the name and EIN of the transferor's partnership.	E	IN of partn	ership	
a List the name and EIN of the transferor's partnership.	98-1441	•	ership	
a List the name and EIN of the transferor's partnership. Name of partnership	98-1441	218	ership Yes	X No
a List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP	98-1441	218		X No X No
a List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	98-1441	218	Yes	
a List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market?	98-1441 Dilished	218	Yes	
Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal	98-1441 Dilished	218	Yes Yes	X No
Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market?	98-1441 Dished	218	Yes Yes Yes	X No
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation)	98-1441 Dished	218	Yes Yes Yes	X No
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC	98-1441 Dlished	218	Yes Yes Yes	X No X No er, if any
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC 6 Address (including country)	98-1441 Dlished	218	Yes Yes Yes	X No X No er, if any
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC 6 Address (including country) FOURTH FLOOR, FITZWILLIAM COURT	98-1441 Dished 5a	218	Yes Yes Yes	X No X No er, if any
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC 6 Address (including country) FOURTH FLOOR, FITZWILLIAM COURT DUBLIN, IRELAND D02 YW24	98-1441 Dished 5a	218	Yes Yes Yes	X No X No er, if any
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC 6 Address (including country) FOURTH FLOOR, FITZWILLIAM COURT	98-1441 Dished 5a	218	Yes Yes Yes	X No X No er, if any
A List the name and EIN of the transferor's partnership. Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC 6 Address (including country) FOURTH FLOOR, FITZWILLIAM COURT DUBLIN, IRELAND D02 YW24 7 Country code of country of incorporation or organization	98-1441 Dished 5a	218	Yes Yes Yes	X No X No er, if any
Name of partnership LONE STAR FUND XI, LP b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estal securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) LONE STAR INTERNATIONAL FINANCE DAC 6 Address (including country) FOURTH FLOOR, FITZWILLIAM COURT DUBLIN, IRELAND D02 YW24 7 Country code of country of incorporation or organization EI 8 Foreign law characterization (see instructions)	98-1441 Dilished 5a 5b 2	218	Yes Yes Yes	X No X No er, if any

		TY COMMUNITY FOU		33-0	378778 Page 2	
	Regarding Tran	sfer of Property (see in	structions)			
Section A - Cash						
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	12/31/2019		139,060.			
10 Was cash the only pro	inder of Part III and g				X Yes No	
	perty (otner tha	n intangible property s (b)	ubject to section 3	(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			41444			
Dulit-III 1055			<u> </u>			
recognition agreement was filed? Yes						
Section C - Intangible	Droporty Subje	at to Spation 267(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length p life on date of tran		(f) Income inclusion for year of transfer	
Property described in sec. 367(d)(4)						
Totals					Form 926 /Rev. 11-2018)	

Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3

14 a	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	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?		☐ No
С	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
	1.367(d)-1(c)(3)(ii) for any intangible property?	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
	plemental Part III Information Required To Be Reported (see instructions)		
<u>S</u>	EE STATEMENT 16		
			
n.	rt IV Additional Information Regarding Transfer of Property (see instructions)		·
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)	······································	
	The thirt was to the the two four forces are continuously and often the two forces.		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before		
17	Type of nonrecognition transaction (see instructions) ► IRC 351 TRANSACTION	Account to the second s	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	Yes	X No
a	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)		X No
C	Recapture under section 1503(d)		X No
	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
20 a		Yes	ZZ NO
	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)	▶ \$	
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
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		V
	covered by section 367(e)(1)? See instructions		X No
		Form 926 (R	ev. 11-2018)

924533 04-01-19

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.

Attachment Sequence No. 128

OMB No. 1545-0026

Name of transferor	
Tunio of tuniology	Identifying number (see instructions)
ORANGE COUNTY COMMUNITY FOUNDATION	
	33-0378778
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X No
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?	
b Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	ldentifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corpora	tion? X 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 X No
a Have basis adjustitions and a decision contact, if poetin made.	
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such un	der section 367),
complete questions 3a through 3d.	•
a List the name and EIN of the transferor's partnership.	
No. of the second secon	PIN of washing
Name of partnership	EiN of partnership
Name of partnership	EIN of partnership
Name of 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?	
 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? 	Yes No
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	Yes No
 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? 	Yes No
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions)	Yes No Yes No
 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? 	Yes No
 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) 	Yes No Yes No
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD.	Yes No Yes No Yes No The state of the state
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country)	Yes No Yes No
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country) PO BOX 309	Yes No Yes No Yes No Sa Identifying number, if any 5b Reference ID number
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country) PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS	Yes No Yes No Yes No The state of the state
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country) PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS 7 Country code of country of incorporation or organization	Yes No Yes No Yes No Sa Identifying number, if any 5b Reference ID number
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country) PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS 7 Country code of country of incorporation or organization CJ	Yes No Yes No Yes No Sa Identifying number, if any 5b Reference ID number
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country) PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS 7 Country code of country of incorporation or organization CJ 8 Foreign law characterization (see instructions)	Yes No Yes No Yes No Sa Identifying number, if any 5b Reference ID number
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? c Is the partner disposing of its entire interest in the partnership? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) ROW DIVERSIFIED OFFSHORE FUND, LTD. 6 Address (including country) PO BOX 309 UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS 7 Country code of country of incorporation or organization CJ	Yes No Yes No Yes No Sa Identifying number, if any 5b Reference ID number

Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) **Sequence of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	No No No No
	plemental Part III Information Required To Be Reported (see instructions)		
	EE STATEMENT 17		
		· · · · · · · · · · · · · · · · · · ·	
Pai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
B-150	g		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before 1.680 % (b) After 2.130 %		
17	Type of nonrecognition transaction (see instructions) ► IRC 351 TRANSACTION		
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	X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?		X No
		Yes	X 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		
		Yes	No No
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	X No
		Form 006 (Da	44 0040)

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

Name of transferor	Identify	ying number (see	instructions)
ORANGE COUNTY COMMUNITY FOUNDATION	33_	-0378778	ì
 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpor. If the transferor was a corporation, complete questions 2a through 2d. If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368 five or fewer domestic corporations? 	(c)) by	Yes 🗵	, ∑ No ∑ No
b Did the transferor remain in existence after the transfer?		Yes	No
If not, list the controlling shareholder(s) and their identifying number(s).			
Controlling shareholder	Identifying	number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent If not, list the name and employer identification number (EIN) of the parent corporation.	corporation? _2	Yes	No
Name of parent corporation	EIN of parent	corporation	
d Have basis adjustments under section 367(a)(4) been made?		Yes 2	Nο
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as complete questions 3a through 3d.	such under section 367),		
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN of part	mership	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	No
c Is the partner disposing of its entire interest in the partnership?	···	Yes	No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establish			_
securities market? Part II Transferee Foreign Corporation Information (see instructions)		Yes	No
Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation)		ng number, if	anv
Tallo of Railoto (or olginos) poration)			
VARADERO INTERNATIONAL, LTD.	98-064		
6 Address (including country) 190 ELGIN AVENUE GEORGE TOWN, GRAND CAYMAN KY1-9005 CAYMAN ISLANDS	5b Reference	ce ID number	
7 Country code of country of incorporation or organization CJ	I		
8 Foreign law characterization (see instructions) CORPORATION			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	No
924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.	Fo	orm 926 (Rev.	11-2018)

		ry COMMUNITY FOU sfer of Property (see in:		33-03	3/8//8 Page 2
Section A - Cash	Regarding Train	sier of Property (see in	structions)		
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	01/01/2020		500,000.		
10 Was cash the only pro	ainder of Part III and g	go to Part IV. n intangible property su			☑ Yes ☐ No
Type of	(a) Date of	(b) Description of	(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
property Stock and	transfer	property	date of transfer	basis	transfer
securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
12 a Were any assets of a foreign corporation? If "Yes," go to line 12th b Was the transferor a continue to limit of the transfere foreign corporation of the transfere foreign corporation of the transfere foreign corporation of the transferred limit of the transferor transfer of the transferor tran	foreign branch (included) b. domestic corporation at is a foreign disregatine 12c. If "No," skip I transfer, was the domporation? ne 12d. If "No," skip I loss amount included asfer property describ C and questions 14a t		disregarded entity) trans ll of the assets of a forei rowned foreign corporat ne 13. holder with respect to th	gn branch tion?	Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ct to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length properties on date of trans		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)					
Totals			semination (F	orm 926 (Rev. 11-2018)

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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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) \$\Bigsim \Bigsim	Yes	No No No
Sup	plemental Part III Information Required To Be Reported (see instructions)		
S	EE STATEMENT 18		
Pai	rt 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) Before160_ % (b) After210_ %		
17	Type of nonrecognition transaction (see instructions) ► IRC 351 TRANSACTION		
18 a b c d	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	Yes	X No X No X No X No
19	Did this transfer result from a change in entity classification?		X No
	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	X No
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	> \$	
C 21	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
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	X No
		Form 926 (R	ev. 11-2018)

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.

Attachment Sequence No. 128

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
ORANGE COUNTY COMMUNITY FOUNDATION	
	33-0378778
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X No
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?	
b Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	Identifying number
	<u></u>
	. V
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?	Yes No
If not, list the name and employer identification number (EIN) of the parent corporation.	
Name of parent corporation E	IN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 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.	
Name of partnership	EIN of partnership
	•
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	Yes No
c Is the partner disposing of its entire interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes No
Part II Transferee Foreign Corporation Information (see instructions)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
PALESTRA CAPITAL OFFSHORE, LTD.	
6 Address (including country)	5b Reference ID number
20 GENESIS CLOSE, DMS HOUSE 2ND FLOOR	0.04
GRAND CAYMAN, CAYMAN ISLANDS KY1-1108 CAYMAN ISLANDS	PAL001
7 Country code of country of incorporation or organization	
CJ	
8 Foreign law characterization (see instructions)	
CORPORATION 9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
9 Is the transferee foreign corporation a controlled foreign corporation?	1621NO

Form	926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
14 a 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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) 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 Yes	Page 3 No No No
	The state of the s		
	plemental Part III Information Required To Be Reported (see instructions)		
	EE STATEMENT 19		
Pa	TIV Additional Information Regarding Transfer of Property (see instructions)		
10	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
16	4.60		
	(a) Before160_ % (b) After180_ % Type of nonrecognition transaction (see instructions) ► IRC 351 TRANSACTION		
17			
18	Indicate whether any transfer reported in Part III is subject to any of the following.		X No
а	Gain recognition under section 904(f)(3)		
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
d		P	X No
19	Did this transfer result from a change in entity classification?		X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	Yes Yes	X 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)	> \$	
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 No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	<u></u>	
	covered by section 367(e)(1)? See instructions	Yes	X No
		Form 926 /Re	ev 11-2018)

924533 04-01-19

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

• Go to www.irs.gov/Form926 for instructions and the latest information.

OWR	No.	1545-0026

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

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
ORANGE COUNTY COMMUNITY FOUNDATION	
	33-0378778
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	n? Yes X No
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?	Yes X No
b Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	Identifying number
Controlling snareholder	identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent cor	poration? X Yes No
If not, list the name and employer identification number (EIN) of the parent corporation.	
Name of parent corporation	EIN of parent corporation
Name of parent corporation	Life of parent corporation
	Yes X No
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as suc	sh under section 367)
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as succomplete questions 3a through 3d.	in under section 307),
a List the name and EIN of the transferor's partnership.	
a List the name and List of the transferor's partnership.	
Name of partnership	EIN of partnership
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	Yes No
c Is the partner disposing of its entire interest in the partnership?	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an establishe	
securities market?	
Part II Transferee Foreign Corporation Information (see instructions)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
HS GROUP SPONSOR FUND II, LTD.	
6 Address (including country)	5b Reference ID number
PO BOX 309	
UGLAND HOUSE, GRAND CAYMAN KY1-1104 CAYMAN ISLANDS	HSG001
Country code of country of incorporation or organization	
СЈ	
8 Foreign law characterization (see instructions)	
CORPORATION	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 11-2018)

		TY COMMUNITY FOU		33-03	378778 Page 2
Section A - Cash	negarding Trail	isler of Property (See in	structions)		<u></u>
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 STMT 20					
10 Was cash the only pro If "Yes," skip the rema		go to Part IV.			X Yes No
Section B - Other Pro		n intangible property s			
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					
nventory					
Other property not listed under another category)					
Property with ouilt-in loss					
Totals					
foreign corporation? If "Yes," go to line 12b Was the transferor a definition of the line of the line of the line of	oreign branch (included) comestic corporation at is a foreign disregate 12c. If "No," skip ransfer, was the dornoration? ne 12d. If "No," skip pass amount included after property describe and questions 14a foreign.	_	disregarded entity) transi dil of the assets of a forei fowned foreign corporat ne 13. deholder with respect to the	gn branch tion?	Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	Property Subje	ect to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length pi		(f) Income inclusion for year of transfer
Property described n sec. 367(d)(4)					
otals					000 (Day: 44 004 0)
				Fe	orm 926 (Rev. 11-2018)

	m 926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
b	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) 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 No No No
<u> </u>	pplemental Part III Information Required To Be Reported (see instructions)		
	SEE STATEMENT 21		
	JEE OTATEMENT ZI		

Pa	art IV Additional Information Regarding Transfer of Property (see instructions)		
16 17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before $\underline{}$ • 160 % (b) After $\underline{}$ • 170 %		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
16 17	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) > IRC 351 TRANSACTION Indicate whether any transfer reported in Part III is subject to any of the following.	Yes	X No
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) > IRC 351 TRANSACTION Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)		X No
16 17 18	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160 % (b) After170 % Type of nonrecognition transaction (see instructions) > IRC 351 TRANSACTION 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	
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes	X No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_% (b) After170_% Type of nonrecognition transaction (see instructions) > IRC 351 TRANSACTION 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	Yes Yes Yes	X No
16 17 18 a b	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) > IRC 351 TRANSACTION 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?	Yes Yes Yes	X No X No X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) > IRC 351 TRANSACTION 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?	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 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)	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 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	Yes Yes Yes Yes Yes Yes	X No X No X No X No
16 17 18 a b c d 19 20 a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before160_ % (b) After170_ % Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION 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	Yes	X No X No X No X No X No

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

• Go to www.irs.gov/Form926 for instructions and the latest information.

ОМВ	No.	1545-0026

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

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
ORANGE COUNTY COMMUNITY FOUNDATION	
	33-0378778
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?	Yes X No
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?	
b Did the transferor remain in existence after the transfer?	X Yes No
If not, list the controlling shareholder(s) and their identifying number(s).	
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? If not, list the name and employer identification number (EIN) of the parent corporation.	X Yes No
Name of parent corporation El	N of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes X No
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under s complete questions 3a through 3d.	ection 367),
·	
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	
c Is the partner disposing of its entire interest in the partnership?	Yes No
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established	
securities market?	Yes No
Part II Transferee Foreign Corporation Information (see instructions)	
4 Name of transferee (foreign corporation)	5a Identifying number, if any
HG VORA OPPORTUNISTIC CAPITAL FUND (CAYMAN) LP.	98-1483688
(5)/	5b Reference ID number
89 NEXUS WAY	
CAMANA BAY, GRAND CAYMAN KY1-9009 CAYMAN ISLANDS	
7 Country code of country of incorporation or organization CJ	
8 Foreign law characterization (see instructions) CORPORATION	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 11-2018)

b Gain recognition under section 904(f)(5)(F) C Recapture under section 1503(d) Yes X Yes	
Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ 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)?	No No No
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	☐ No
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	
(a) Before	
18 Indicate whether any transfer reported in Part III is subject to any of the following. Yes X a Gain recognition under section 904(f)(3) Yes X b Gain recognition under section 904(f)(5)(F) Yes X c Recapture under section 1503(d) Yes X	
a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) Yes X X Yes X	
b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) Yes X Yes X	
c Recapture under section 1503(d) Yes X	No
	No No
d Exchange gain under section 987 Yes X	-
19 Did this transfer result from a change in entity classification?	No
20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)	No No
If "Yes," complete lines 20b and 20c.	No No No
b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$	No No No No
c Did the domestic corporation not recognize gain or loss on the distribution of property because the	No No No No
property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	No No No No
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	No No No No
covered by section 367(e)(1)? See instructions Yes X	No No No No No No

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.

Attachment Sequence No. 128

OMB No. 1545-0026

Pai	t U.S. Transferor Information (see instructions)			
Nam	e of transferor	Identifying numbe	r (see instructions)	
OI	RANGE COUNTY COMMUNITY FOUNDATION			
				78
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?		Yes	X No
2	If the transferor was a corporation, complete questions 2a through 2d.			
а	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?		Yes	X No
b	Did the transferor remain in existence after the transfer?		X Yes	☐ No
	If not, list the controlling shareholder(s) and their identifying number(s).			
	Cautuallian abayahalday	ldor	atifuing number	
	Controlling shareholder		ntifying number	
		,		
	If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation		X Yes	No
C	If not, list the name and employer identification number (EIN) of the parent corporation.	HII	[21] Tes	L INO
	Triot, list the name and employer identification number (Env) of the parent corporation.			
	Name of parent corporation	EIN of p	parent corporation	on
d	Have basis adjustments under section 367(a)(4) been made?		Yes	X No
3	If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under	er section	n 367),	
	complete questions 3a through 3d.			
а	List the name and EIN of the transferor's partnership.			
	Name of partnership	EIN	of partnership	
b	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	No
С	Is the partner disposing of its entire interest in the partnership?		Yes	No
d	Is the partner disposing of an interest in a limited partnership that is regularly traded on an established			
	securities market?		Yes	No
Pai	t II Transferee Foreign Corporation Information (see instructions)			
4	Name of transferee (foreign corporation)	5a le	dentifying numbe	er, if any
			0.4.0.0.4.4	
			-0490241	
The state of the s			Reference ID numl	oer
	BOX 309 UGLAND HOUSE			
<u>GR</u> Z	AND CAYMAN, CAYMAN ISLANDS KY1-1104			
7	Country code of country of incorporation or organization			
<u>Ci</u>				
8	Foreign law characterization (see instructions)			
	PRPORATION			[V]
9	Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
924531	04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.		rorm 926 (F	Rev. 11-2018)

924531 04-01-19 LHA For Paperwork Reduction Act Notice, see separate instructions.

		TY COMMUNITY FOU sfer of Property (see in		33-03	378778 Page 2
Section A - Cash		7			
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	04/01/2020		1,000,000.		
10 Was cash the only pro If "Yes," skip the rema	perty transferred? ninder of Part III and g				X Yes No
	·	n intangible property s			/
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					
nventory					
Other property not listed under another category)					
Property with					
Julie 11 1000					
Totals					
Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? If "Yes," go to line 12b. Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13. Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13. If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13. If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13. If "No," skip Section C and questions 14a through 15. Section C - Intangible Property Subject to Section 367(d)					
·					
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length pi		(f) Income inclusion for year of transfer
Property described n sec. 367(d)(4)					
Totals					
				F	orm 926 (Rev. 11-2018)

Form	1926 (Rev. 11-2018) ORANGE COUNTY COMMUNITY FOUNDATION	33-0378778	Page 3
14 a b c d	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? 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) \$\Bigsim \Bigsim	Yes Yes	Page 3 No No No No
Sup	plemental Part III Information Required To Be Reported (see instructions)		
S	EE STATEMENT 23		
-			
,			
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)	W	
Lancia de la companya			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before • 090 % (b) After • 090 %		
17	Type of nonrecognition transaction (see instructions) ▶ IRC 351 TRANSACTION		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а		Yes	X No
b	Gain recognition under section 904(f)(5)(F)		X No
С	Recapture under section 1503(d)		X No
d	Exchange gain under section 987		X No
19	Did this transfer result from a change in entity classification?		X No
	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? (see instructions)		X 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)	> \$	
c	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
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	X No
		Form 926 (R	ev. 11-2018)

924533 04-01-19

FORM 926 PART III - INFORMATION REGARDI TRANSFER OF PROPERTY		STATEMENT 11
	CASH	
(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER	
04/01/2019 09/01/2019	500,000. 1,000,000.	
	1,500,000.	

FORM 926

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 12

WINDHAM RISK PREMIA (CAYMAN) FUND LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUDNATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510 NEWPORT BEACH, CA 92660 FEIN: 33-0378778 TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION NAME: WINDHAM RISK PREMIA (CAYMAN) FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 04/01/2019

PROPERTY TRANSFERRED: CASH - \$500,000

DATE: 09/01/2019

PROPERTY TRANSFERRED: CASH - \$1,000,000

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

ORANGE COUNTY COMMUNITY FOUNDATION

WINDHAM RISK PREMIA (CAYMAN) FUND LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: WINDHAM RISK PREMIA (CAYMAN) FUND, LTD.

FEIN: N/A

ADDRESS: UGLAND HOUSE GRAND CAYMAN, CJ KYI-1104

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE PROPERTY TRANSFERRED PROPERTY RECEIVED 04/01/2019 CASH - \$500,000 COMMON STOCK CASH - 1,000,000 09/01/2019 COMMON STOCK

3. CONSIDERATION RECEIVED

SEE ABOVE

ORANGE COUNTY COMMUNITY FOUNDATION

WINDHAM RISK PREMIA (CAYMAN) FUND LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY:	NOT	APPLICABLE
STOCK OR SECURITIES:	TOM	APPLICABLE
DEPRECIATED PROPERTY:	TOM	APPLICABLE
PROPERTY TO BE LEASED:	TOM	APPLICABLE
PROPERTY TO BE SOLD:	TOM	APPLICABLE
TRANSFERS TO FSCS:	TOM	APPLICABLE
TAINTED PROPERTY:	\mathbf{TOM}	APPLICABLE
FOREIGN LOSS BRANCH:	TOM	APPLICABLE
OTHER INTANGIBLES:	\mathbf{NOT}	APPLICABLE

FORM 926

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 13

BROADRIVER III (IRELAND) DAC

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUDNATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510 NEWPORT BEACH, CA 92660 FEIN: 33-0378778 TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION NAME: BROADRIVER III (IRELAND) DAC FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY: DATE: 12/31/2019

PROPERTY TRANSFERRED: CASH - \$220,903

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

BROADRIVER III (IRELAND) DAC

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION NAME: BROADRIVER III (IRELAND) DAC

FEIN: N/A

ADDRESS: 32 MOLESWORTH STREET

DUBLIN, IRELAND D02 Y512

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE

PROPERTY TRANSFERRED

PROPERTY RECEIVED

12/31/2019

CASH - \$220,903

COMMON STOCK

3. CONSIDERATION RECEIVED

SEE ABOVE

ORANGE COUNTY COMMUNITY FOUNDATION

BROADRIVER III (IRELAND) DAC

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: DEPRECIATED PROPERTY: NOT APPLICABLE PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE NOT APPLICABLE TAINTED PROPERTY: FOREIGN LOSS BRANCH: NOT APPLICABLE OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

NOT APPLICABLE

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 14

LSF10 WOLVERINE MIP WE S.A.R.L

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUDNATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510 NEWPORT BEACH, CA 92660 FEIN: 33-0378778 TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION NAME: LSF10 WOLVERINE MIP WE S.A R.L.

FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 07/01/2019

PROPERTY TRANSFERRED: CASH - \$183,806

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE

LSF10 WOLVERINE MIP WE S.A.R.L

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: LSF10 WOLVERINE MIP WE S.A.R.L

FEIN: N/A

ADDRESS: 33 RUE DU PUITS ROMAIN

BERTRANGE, LUXEMBOURG L-8070

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 12/31/2019 PROPERTY TRANSFERRED CASH - \$183,806

PROPERTY RECEIVED

COMMON STOCK

3. CONSIDERATION RECEIVED

LSF10 WOLVERINE MIP WE S.A.R.L

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: NOT APPLICABLE DEPRECIATED PROPERTY: PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE NOT APPLICABLE FOREIGN LOSS BRANCH: OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 15

LSF10 SUMMERTIME INVESTMENTS, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: LSF10 SUMMERTIME INVESTMENTS, LTD.

FEIN: 98-1451628

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 12/31/19

PROPERTY TRANSFERRED: CASH - \$308,835

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

LSF10 SUMMERTIME INVESTMENTS, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: LSF10 SUMMERTIME INVESTMENTS, LTD.

FEIN: 98-1451628

ADDRESS: 7 REED STREET

BERMUDA, BD HM11

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 12/31/19 PROPERTY TRANSFERRED

PROPERTY RECEIVED

CASH - \$308,835

COMMON STOCK

3. CONSIDERATION RECEIVED

LSF10 SUMMERTIME INVESTMENTS, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: NOT APPLICABLE DEPRECIATED PROPERTY: PROPERTY TO BE LEASED: NOT APPLICABLE NOT APPLICABLE PROPERTY TO BE SOLD: TRANSFERS TO FSCS: NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE NOT APPLICABLE FOREIGN LOSS BRANCH: OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 16

LONE STAR INTERNATIONAL FINANCE DAC

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION

4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: LONE STAR INTERNATIONAL FINANCE DAC

FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 12/31/2019

PROPERTY TRANSFERRED: CASH - \$139,060

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

LONE STAR INTERNATIONAL FINANCE DAC

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: LONE STAR INTERNATIONAL FINANCE DAC

FEIN: N/A

ADDRESS: FOURTH FLOOR FITZWILLIAM COURT

IRELAND EI D02 YW24

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 12/31/2019 PROPERTY TRANSFERRED

PROPERTY RECEIVED

CASH - \$139,060

COMMON STOCK

3. CONSIDERATION RECEIVED

LONE STAR INTERNATIONAL FINANCE DAC

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: NOT APPLICABLE DEPRECIATED PROPERTY: PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE FOREIGN LOSS BRANCH: OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 17

ROW DIVERSIFIED OFFSHORE FUND, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: ROW DIVERSIFIED OFFSHORE FUND, LTD.

FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 09/01/2019

PROPERTY TRANSFERRED: CASH - \$1,000,000

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

ROW DIVERSIFIED OFFSHORE FUND, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: ROW DIVERSIFIED OFFSHORE FUND, LTD.

FEIN: N/A

ADDRESS: PO BOX 309, UGLAND HOUSE

GRAND CAYMAN, CJ KYI-1104

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 09/01/2019 PROPERTY TRANSFERRED CASH - \$1,000,000

PROPERTY RECEIVED

COMMON STOCK

3. CONSIDERATION RECEIVED

ROW DIVERSIFIED OFFSHORE FUND, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: DEPRECIATED PROPERTY: NOT APPLICABLE PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE FOREIGN LOSS BRANCH: NOT APPLICABLE OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 18

VARADERO INTERNATIONAL, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: VARADERO INTERNATIONAL, LTD.

FEIN: 98-0649836

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 01/01/2020

PROPERTY TRANSFERRED: CASH - \$500,000

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

VARADERO INTERNATIONAL, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: VARADERO INTERNATIONAL, LTD.

FEIN: 98-0649836

ADDRESS: 190 ELGIN AVENUE, GEORGE TOWN

GRAND CAYMAN, CJ KY1-9005

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 01/01/2020

PROPERTY TRANSFERRED

PROPERTY RECEIVED

CASH - \$500,000

COMMON STOCK

3. CONSIDERATION RECEIVED

VARADERO INTERNATIONAL, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: DEPRECIATED PROPERTY: NOT APPLICABLE PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE FOREIGN LOSS BRANCH: OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 19

PALESTRA CAPITAL OFFSHORE, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: PALESTRA CAPITAL OFFSHORE, LTD.

FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 01/01/2020

PROPERTY TRANSFERRED: CASH - \$500,000

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

PALESTRA CAPITAL OFFSHORE, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: PALESTRA CAPITAL OFFSHORE, LTD.

FEIN: N/A

ADDRESS: 20 GENESIS CLOSE, DMS HOUSE, 2ND FLOOR

GRAND CAYMAN, CJ KY1-1108

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 01/01/2020

PROPERTY TRANSFERRED CASH - \$500,000

PROPERTY RECEIVED

COMMON STOCK

3. CONSIDERATION RECEIVED

PALESTRA CAPITAL OFFSHORE, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY:	\mathbf{rom}	APPLICABLE
STOCK OR SECURITIES:	NOT	APPLICABLE
DEPRECIATED PROPERTY:	\mathbf{ron}	APPLICABLE
PROPERTY TO BE LEASED:	\mathbf{rom}	APPLICABLE
PROPERTY TO BE SOLD:	\mathbf{rom}	APPLICABLE
TRANSFERS TO FSCS:	TOM	APPLICABLE
TAINTED PROPERTY:	TOM	APPLICABLE
FOREIGN LOSS BRANCH:	TOM	APPLICABLE
OTHER INTANGIBLES:	TOM	APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

FORM 926	PART III - INFORMATION REGARDING TRANSFER OF PROPERTY	STATEMENT 20
	CASH	
(A) DATE OF TRANSFER	(C) FAIR MARKET VALUE ON DATE OF TRANSFER	
12/01/2019 01/01/2020	14,547. 194,566.	
	209,113.	

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 21

HS GROUP SPONSOR FUND II, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510 NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION NAME: HS GROUP SPONSOR FUND II, LTD. FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 12/01/2019

PROPERTY TRANSFERRED: CASH - \$14,546.98

DATE: 01/01/2020

PROPERTY TRANSFERRED: CASH - \$194,565.80

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 21

HS GROUP SPONSOR FUND II, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION NAME: HS GROUP SPONSOR FUND II, LTD.

FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 12/01/2019

PROPERTY TRANSFERRED: CASH - \$14,546.98

DATE: 01/01/2020

PROPERTY TRANSFERRED: CASH - \$194,565.80

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

HS GROUP SPONSOR FUND II, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: HS GROUP SPONSOR GUND II, LTD.

FEIN: N/A

ADDRESS: PO BOX 309, UGLAND HOUSE

GRAND CAYMAN, CJ KYI-1104

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

 DATE
 PROPERTY
 TRANSFERRED
 PROPERTY
 RECEIVED

 12/31/2019
 CASH - \$14,546.98
 COMMON STOCK

 01/01/2020
 CASH - \$194,565.80
 COMMON STOCK

3. CONSIDERATION RECEIVED

HS GROUP SPONSOR FUND II, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE STOCK OR SECURITIES: NOT APPLICABLE DEPRECIATED PROPERTY: NOT APPLICABLE PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE NOT APPLICABLE TAINTED PROPERTY: FOREIGN LOSS BRANCH: NOT APPLICABLE OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 22

HG VORA OPPORTUNISTIC CAPITAL FUND (CAYMAN) LP.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: HG VORA OPPORTUNISTIC CAPITAL FUND (CAYMAN) LP.

FEIN: N/A

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 11/14/2019

PROPERTY TRANSFERRED: CASH - \$1,000,000

3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE

4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

HG VORA OPPORTUNISTIC CAPITAL FUND (CAYMAN) LP.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: HG VORA OPPORTUNISTIC CAPITAL FUND (CAYMAN) LP.

FEIN: 98-1483688

ADDRESS: 89 NEXUS WAY, CAMANA BAY

GRAND CAYMAN, CJ KY1-9009

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE 11/14/2019 PROPERTY TRANSFERRED

CASH - \$1,000,000

PROPERTY RECEIVED

COMMON STOCK

3. CONSIDERATION RECEIVED

HG VORA OPPORTUNISTIC CAPITAL FUND (CAYMAN) LP.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE STOCK OR SECURITIES: NOT APPLICABLE DEPRECIATED PROPERTY: NOT APPLICABLE PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE FOREIGN LOSS BRANCH: OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES:

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 23

ALPHADYNE INTERNATIONAL FUND, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: ALPHADYNE INTERNATIONAL FUND, LTD.

FEIN: 98-0490241

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 03/31/2020

PROPERTY TRANSFERRED: CASH - \$1,000,000

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

SUPPLEMENTAL PART III INFORMATION REQUIRED TO BE REPORTED

STATEMENT 23

ALPHADYNE INTERNATIONAL FUND, LTD.

STATEMENT PURSUANT TO 1.351-3(A) BY THE ORANGE COUNTY COMMUNITY FOUNDATION, A SIGNIFICANT TRANSFEROR.

ORANGE COUNTY COMMUNITY FOUNDATION 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

FEIN: 33-0378778

TAX YEAR ENDED: JUNE 30, 2020

1. TRANSFEREE FOREIGN CORPORATION

NAME: ALPHADYNE INTERNATIONAL FUND, LTD.

FEIN: 98-0490241

2. THE ORANGE COUNTY COMMUNITY FOUNDATION TRANSFERRED THE FOLLOWING PROPERTY:

DATE: 03/31/2020

PROPERTY TRANSFERRED: CASH - \$1,000,000

- 3. AGGREGATE FAIR MARKET VALUE AND BASIS OF THE PROPERTY TRANSFERRED: SEE ABOVE
- 4. DATE AND CONTROL NUMBER OF ANY APPLICABLE PRIVATE LETTER RULING(S): NOT APPLICABLE

ALPHADYNE INTERNATIONAL FUND, LTD.

STATEMENT OF PROPERTY TRANSFER PURSUANT TO TREASURY REGULATIONS SECTIONS 1.6038B-1(C) AND 1.6038B-1T(C)

1. TRANSFEROR:

NAME: ORANGE COUNTY COMMUNITY FOUNDATION

FEIN: 33-0378778

ADDRESS: 4041 MACARTHUR BLVD., SUITE 510

NEWPORT BEACH, CA 92660

2. TRANSFER:

A) TRANSFEREE FOREIGN CORPORATION

NAME: ALPHADYNE INTERNATIONAL FUND, LTD.

FEIN: 98-0490241

ADDRESS: PO BOX 309, UGLAND HOUSE

GRAND CAYMAN, CJ KYI-1104

B) THE ORANGE COUNTY COMMUNITY FOUNDAITON TRANSFERRED THE FOLLOWING PROPERTY:

DATE

PROPERTY TRANSFERRED

PROPERTY RECEIVED

03/31/2020

CASH - \$1,000,000

COMMON STOCK

3. CONSIDERATION RECEIVED

ALPHADYNE INTERNATIONAL FUND, LTD.

4. PROPERTY TRANSFERRED:

A) ACTIVE BUSINESS PROPERTY: NOT APPLICABLE NOT APPLICABLE STOCK OR SECURITIES: DEPRECIATED PROPERTY: NOT APPLICABLE PROPERTY TO BE LEASED: NOT APPLICABLE PROPERTY TO BE SOLD: NOT APPLICABLE TRANSFERS TO FSCS: NOT APPLICABLE NOT APPLICABLE TAINTED PROPERTY: NOT APPLICABLE FOREIGN LOSS BRANCH: OTHER INTANGIBLES: NOT APPLICABLE

5. TRANSFER OF FOREIGN BRANCH WITH PREVIOUSLY DEDUCTED LOSSES: