NOTICE 2018-100

Form 990-T	6	Exempt Orgar	nization Bus	ine	ss Income T	ax Returr	า	OMB No. 1545-0687
		an (an	d proxy tax unde	er se	ction 6033(e))			2040
	For ca	lendar year 2018 or other tax yea	r beginning		, and ending			2018
Department of the Treasury		•	•		ns and the latest informa			Open to Bublic Inspection for
Internal Revenue Service	•	Do not enter SSN number	s on this form as it may	be ma	de public if your organiza	ition is a 501(c)(3)		Open to Public Inspection for 501(c)(3) Organizations Only
A Check box if address changed		Name of organization (Check box if name ch	nanged	and see instructions.)		Empl	oyer identification number oyees' trust, see ctions.)
B Exempt under section	Print	New Hampshin	re Charitab	le 1	Foundation		0	2-6005625
X 501(c)(3)	or	Number, street, and room						ated business activity code nstructions.)
408(e) 220(e)	Туре	37 Pleasant		,			(See II	istructions.)
408A 530(a)		City or town, state or prov	ince, country, and ZIP or	foreiar	n postal code			
529(a)		Concord, NH	03301-400	5			541	900
C Book value of all assets	<u> </u>	F Group exemption numb G Check organization type	er (See instructions.)	<u> </u>			ı	_
732,791,8	78.	G Check organization type	X 501(c) corp	oration	501(c) trust	401(a)	trust	Other trust
H Enter the number of the	organiza	ition's unrelated trades or b	usinesses.	2	Describe t	he only (or first) un		
trade or business here	► Se	ee Statement	1			complete Parts I-V.		than one,
		ice at the end of the previou		rts I and				
business, then complete		•	, ,		, ,			
		ooration a subsidiary in an a	ffiliated group or a paren	t-subsi	diary controlled group?	▶ [Ye	s X No
		tifying number of the parent			д			
J The books are in care of			· · · · · · · · · · · · · · · · · · ·		Telepho	ne number 🕨 (603) 225-6641
		de or Business Inc	ome		(A) Income	(B) Expenses		(C) Net
1a Gross receipts or sale	S.	55,232.						
b Less returns and allow			c Balance	1c	55,232.			
		A, line 7)		2	,			
3 Gross profit. Subtract				3	55,232.			55,232.
•		ch Schedule D)		4a	, i			<u> </u>
		Part II, line 17) (attach Form		4b				
		sts	· ·	4c				
		ship or an S corporation (at	The state of the s	5	-591,225.	Stmt 2	:	-591,225.
6 Rent income (Schedu			,	6				3727223
•		me (Schedule E)		7				
		and rents from a controlled o		8				
· · · · · ·	,	on 501(c)(7), (9), or (17) or	· ·	9				
		ome (Schedule I)	· ' '	10				
		e J)		11				
		ns; attach schedule)		12				
		gh 12			-535,993.			-535,993.
Part II Deductio	ns No	ot Taken Elsewher	e (See instructions fo	r limita				, , , , , , , , , , , , , , , , , , , ,
		utions, deductions must				income.)		
14 Compensation of off	icers, di	rectors, and trustees (Sche	dule K)				14	_
							15	_
							16	
							17	
18 Interest (attach sche	dule) (s	ee instructions)					18	
19 Taxes and licenses	, ,						19	1,336.
20 Charitable contribution	ons (Se	e instructions for limitation	ules) Stateme:	nt!	5 See State	ement 3	20	0.
	,	562)	,					
22 Less depreciation cla	aimed o	n Schedule A and elsewhere	on return		22a		22b	
							23	
		mpensation plans					24	
25 Employee benefit pro							25	
	-	chedule I)					26	
27 Excess readership co	osts (Sc	hedule J)					27	
28 Other deductions (at	tach scl	nedule)			See State	ement 4	28	93,672.
29 Total deductions. A	dd lines	14 through 28					29	95,008.
		ncome before net operating					30	-631,001.
		loss arising in tax years beg					31	
	_	ncome. Subtract line 31 fro	-	-	•		32	-631,001.

Part I	II Total Unrelated Business Taxa								
33	Total of unrelated business taxable income comput	ted from all unrelated trades	or businesses (see instructions)	33		1,8 3	
34	Amounts paid for disallowed fringes					34		1,20	
35	Deduction for net operating loss arising in tax years	s beginning before January	1, 2018 (see ins	tructions) S	tmt 6	35	59	9,10	06.
36	Total of unrelated business taxable income before	specific deduction. Subtract	line 35 from the	sum of					
	lines 33 and 34					36			
37	Specific deduction (Generally \$1,000, but see line 3	37 instructions for exception	ıs)			37		L,00	00.
38	Unrelated business taxable income. Subtract line							-	
	enter the smaller of zero or line 36					38			0.
Part I	V Tax Computation								
39	Organizations Taxable as Corporations. Multiply I	line 38 by 21% (0.21)			•	39			0.
40	Trusts Taxable at Trust Rates. See instructions for					9.0			
	Tax rate schedule or Schedule D (Fo					40			
41	Proxy tax. See instructions								
42									
	Alternative minimum tax (trusts only)					42			
43	Tax on Noncompliant Facility Income. See instruc	illollo				43			0.
Port \	Total. Add lines 41, 42, and 43 to line 39 or 40, wh	ichevel applies				44			<u> </u>
	-	tuusta attaab Farra 1110)		450					
	Foreign tax credit (corporations attach Form 1118;					_			
D	Other credits (see instructions)			4=		_			
C						_			
	Credit for prior year minimum tax (attach Form 880								
е	•								
46	Subtract line 45e from line 44								0.
47	Other taxes. Check if from: Form 4255				r (attach schedule)				
48	Total tax. Add lines 46 and 47 (see instructions) \dots								0.
49	2018 net 965 tax liability paid from Form 965-A or								0.
	Payments: A 2017 overpayment credited to 2018				219,411	<u>•</u>			
	2018 estimated tax payments								
C	Tax deposited with Form 8868			50c					
d	Foreign organizations: Tax paid or withheld at sour	ce (see instructions)		50d					
е	Backup withholding (see instructions)			50e					
f	Credit for small employer health insurance premiur	ms (attach Form 8941)		50f					
g	Other credits, adjustments, and payments: Fo	orm 2439							
	Form 4136 0	ther	 Total ▶	- 50g					
51	Total payments. Add lines 50a through 50g					51	219	9,43	11.
52	Estimated tax penalty (see instructions). Check if Fo	orm 2220 is attached 🕨 🛚				52			
53	Tax due. If line 51 is less than the total of lines 48,					53			
54	Overpayment. If line 51 is larger than the total of li	nes 48, 49, and 52, enter an	nount overpaid			- 54	219	9,4:	<u>11.</u>
55	Enter the amount of line 54 you want: Credited to 2	2019 estimated tax	219	,411. F	Refunded >	55			0.
Part \	/I Statements Regarding Certain	Activities and Oth	er Informa	tion (see instr	ructions)				
56	At any time during the 2018 calendar year, did the	organization have an interes	t in or a signatu	re or other autho	rity			Yes	No
	over a financial account (bank, securities, or other)	in a foreign country? If "Yes	s," the organizati	on may have to	file				
	FinCEN Form 114, Report of Foreign Bank and Fina			-					
	here >	,,		gg	,				Х
57	During the tax year, did the organization receive a c	distribution from or was it th	ne grantor of or	transferor to a f	oreian trust?				X
0,	If "Yes," see instructions for other forms the organization		io grantor oi, or	transfer to, a i	oroigii truot:				
58	Enter the amount of tax-exempt interest received or	•	r ▶ \$						
	Under penalties of perjury, I declare that I have examined			d statements, and t	o the best of my kn	nowledge and	pelief, it is	rue,	
Sign	correct, and complete. Declaration of preparer (other tha								=
Here			Presid	ent & C	TO .	May the IRS d			vith
	Signature of officer	Date	Title	CIIC & C		the preparer sl instructions)?		· —	No
		,)ata	Check	if PTIN			,
	Print/Type preparer's name	Preparer's signature	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \)ate					
Paid	Nicholas E. Porto	//./ 1	/\	0/31/19	self- employed		13102	283	
Prepa	Dolon Morman	Norrag		0/31/19	Figure 1 - FIRE N		-0494		
Use C	Only Firm's name ► Baker Newman Box 507	т « иолея			Firm's EIN	- UI.	0494	± 0 4 (<u> </u>
		ME 0/112			Dhorana	(207)	070	21	0.0
	Firm's address ▶ Portland,	MC AATT7			Phone no.	(4 U /)	0/9	- Z I I	JU

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Form **990-T** (2018)

Schedule A - Cost of Good	Is Sold. Enter	method of inver	ntory v	valuation ► N/A					
1 Inventory at beginning of year	1		6	Inventory at end of yea	r		6		
2 Purchases	2		7	Cost of goods sold. Su	ıbtract	line 6			
3 Cost of labor				from line 5. Enter here	and in I	Part I,			
4a Additional section 263A costs				line 2			7		
(attach schedule)	4a		8	Do the rules of section	ı 263A (with respect to				s No
b Other costs (attach schedule)	4b			property produced or a	cquire	d for resale) apply to			
5 Total. Add lines 1 through 4b				the organization?					
Schedule C - Rent Income (see instructions)	(From Real	Property an	d Pe	rsonal Property	Leas	ed With Real Pro	per	ty)	
1. Description of property									
(1)									
(2)									
(3)									,
(4)									,
	2. Rent receiv	ed or accrued				0/5/5 11 11 11			
(a) From personal property (if the per rent for personal property is mor 10% but not more than 50%	e than	of rent for	persona	sonal property (if the percental I property exceeds 50% or if sed on profit or income)	age	3(a) Deductions directl columns 2(a) a		ected with the income (attach schedule)	e 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, colum	2(a) and 2(b). Er n (A)	ter			0.	(b) Total deductions. Enter here and on page 1, Part I, line 6, column (B)	. ▶		0.
Schedule E - Unrelated De			instru	ıctions)		•			
			;	2. Gross income from or allocable to debt-	(-)	3. Deductions directly conto debt-finan		operty	
1. Description of debt-f	inanced property			financed property	(a)	Straight line depreciation (attach schedule)		(b) Other deducti (attach schedule	
(1)							_		
(2)							_		
(3)									
(4)									
4. Amount of average acquisition debt on or allocable to debt-financed property (attach schedule)	of or a	e adjusted basis allocable to inced property in schedule)		6. Column 4 divided by column 5		7. Gross income reportable (column 2 x column 6)		8. Allocable dedu (column 6 x total of 6 3(a) and 3(b)	columns
(1)			1	%			+		
(2)				%			\top		
(3)				%					,
(4)				%			\top		
			•			Enter here and on page 1, Part I, line 7, column (A).		Enter here and on pa Part I, line 7, colum	
Totals						0			0.
Total dividends-received deductions in				······································					0.

Form **990-T** (2018)

Schedule F - Interest,	Annuities, Ro	yalties, a	and Rent	s From C	ontrolle	ed Organiz	atior	1S (see ins	truction	s)
			Exempt (Controlled O	rganizati	ons				
1. Name of controlled organiza		Employer lentification number		related income e instructions)		al of specified nents made	include	t of column 4 ed in the contraction's gross in	rolling	6. Deductions directly connected with income in column 5
(1)										
(2)										
(3)										
(4)										
Nonexempt Controlled Organ	izations				1					
7. Taxable Income	8. Net unrelated	income (loss)	9 Total	of specified pay	ments	10. Part of colu	mn 9 that	t is included	11 De	ductions directly connected
	(see instru	ctions) `		made		in the controlli gross	ing organ s income	ization's		i income in column 10
(1)										
(2)										
(3)										
(4)										
						Add colun Enter here and line 8, o		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 (see inst	ent Income of tructions)	f a Section	on 501(c)((7), (9), or	(17) Or	ganization	1			
1. Desc	cription of income			2. Amount of	income	 Deduction directly connected (attach sched) 	ected	4. Set-		5. Total deductions and set-asides (col. 3 plus col. 4)
(1)										
(2)										
(3)										
(4)										
				Enter here and Part I, line 9, co						Enter here and on page 1, Part I, line 9, column (B).
Totals					0.					0.
Schedule I - Exploited (see instr	-	vity Inco	ne, Othe	r Than Ad	dvertisi	ng Income	e 			
1. Description of exploited activity	2. Gross unrelated business income from trade or business	directly with	Expenses y connected production unrelated ess income	4. Net inconfrom unrelated business (cominus colum gain, comput through	d trade or olumn 2 in 3). If a e cols. 5	5. Gross incofrom activity to is not unrelated business inco	that ted	6. Exp attributa colur	able to	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1)										
(2)										
(2) (3)										
(4)										
	Enter here and on page 1, Part I, line 10, col. (A).	page line	here and on e 1, Part I, I0, col. (B).							Enter here and on page 1, Part II, line 26.
Schedule J - Advertisi		0.	0.							0.
Part I Income From				oolidataa	l Boois					
income From	Periodicals F	eported	on a Con	Solidated	Dasis	_				
1. Name of periodical	2. Gro advertis incon	sing 2	3. Direct divertising costs	or (loss) (c col. 3). If a g	tising gain ol. 2 minus ain, comput hrough 7.	5. Circulatincome		6. Reade cost		7. Excess readership 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	•						0.
										Form 990-T (2018)

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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.)

1. Name of periodical	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).
(1)						
(2)						
(3)						
(4)						
Totals from Part I	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 27.
Totals, Part II (lines 1-5)	0.	0.				0.

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

1. Name	2. Title	3. 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 (2018)

Form 990-T	Description of Organization's Primary Unrelated	Statement	1
	Business Activity		

UBI from investment partnerships qualifying for De Minimis Exception & Scholarship Contracted Services

To Form 990-T, Page 1

Borealis Granite Fund - Ordinary Business Income (loss) Davidson Kempner Institutional Partners - Ordinary Business Income (loss) Denham Oil and Gas Fund LP - Ordinary Business Income (loss) Encap Energy Capital Fund IX - Ordinary Business Income (loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Forester Partners, LP - Ordinary Business Income (loss) Great Hill Equity Partners VI, LP - Ordinary Business Income (loss) - Ordinary Business Income (loss) Highfields Capital IV LP - Ordinary Business Income (loss) Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los Lyme Forest Fund TE - Ordinary Business Income (loss) Lyme Forest Fund TII TE - Ordinary Business Income (loss) Oaktree Opportunities Fund VIII LP - Ordinary Business Income (loss) Oaktree Opportunities Fund VIII D - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) Park St Capital Natural Resource Fund III - Ordinary Business Income (loss) Park St Capital Natural Resource Fund III - Ordinary Business Income (loss) Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Park St Capital Natural Resource Fund IV - Ordinary Park St Capital Natural Resource Fund IV - Ordinary	Form 990-T Income (Loss) from Partnerships	Statement 2
Davidson Kempner Institutional Partners - Ordinary Business Income (loss) -1,853. Denham Oil and Gas Fund LP - Ordinary Business Income (loss) -390,928. Encap Energy Capital Fund IX - Ordinary Business Income (loss) -211,560. Encap Energy Capital Fund X - Ordinary Business Income (loss) -578,949. Forester Partners, LP - Ordinary Business Income (loss) Great Hill Equity Partners VI, LP - Ordinary Business Income (loss) -0rdinary Business Income (loss) -0rdinary Business Income (loss) -0rdinary Business Income (loss) -0rdinary Business Income (loss) -1,875. Highfields Capital IV LP - Ordinary Business Income (loss) Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los Lyme Forest Fund TE - Ordinary Business Income (loss) -336. Lyme Forest Fund III TE - Ordinary Business Income (loss) -338. Oaktree Opportunities Fund VIII LP - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) -36. Oaktree Opportunities Fund XB - Ordinary Business Income (loss) -376. Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) -305. Park St Capital Natural Resource Fund II - Ordinary Business Income (loss) -376. Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) -376. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -376. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -376. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -376. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -376. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -44, 215. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -49,215. Park St Capital Partners VIII-A, LP - Ordinary Business	Description	
Business Income (loss) Denham Oil and Gas Fund LP - Ordinary Business Income (loss) Encap Energy Capital Fund IX - Ordinary Business Income (loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Forester Partners, LP - Ordinary Business Income (loss) Great Hill Equity Partners VI, LP - Ordinary Business Income (loss) - Ordinary Business Income (loss) Highfields Capital IV LP - Ordinary Business Income (loss) Forests Fund III Equity Vartners VI, LP Series VC - Ordinary Business Income (los) Lyme Forest Fund TE - Ordinary Business Income (loss) Lyme Forest Fund III TE - Ordinary Business Income (loss) Income (loss) Oaktree Opportunities Fund VIIIB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB - Ordinary Business Income (loss) Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) Park St Capital Natural Resource Fund II - Ordinary Business Income (loss) Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Partners VIII-A, LP - Ordinary Business	Borealis Granite Fund - Ordinary Business Income (loss)	-124.
(loss) Encap Energy Capital Fund IX - Ordinary Business Income (loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Forester Partners, LP - Ordinary Business Income (loss) Great Hill Equity Partners VI, LP - Ordinary Business Income (loss) - Ordinary Business Income - Opportunities Fund VIIIB - Ordinary Business - Ordinary Business Income - Ordinary Business	Business Income (loss)	-1,853.
(loss) Encap Energy Capital Fund X - Ordinary Business Income (loss) Forester Partners, LP - Ordinary Business Income (loss) Foreat Hill Equity Partners VI, LP - Ordinary Business Income (loss) - Highfields Capital IV LP - Ordinary Business Income (loss) Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los Lyme Forest Fund TE - Ordinary Business Income (loss) - 386. Lyme Forest Fund III TE - Ordinary Business Income (loss) - 33. Oaktree Opportunities Fund VIII LP - Ordinary Business Income (loss) - 608. Oaktree Opportunities Fund VIIIB - Ordinary Business Income (loss) - 736. Oaktree Opportunities Fund XB - Ordinary Business Income (loss) - 736. Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) - 744. Park St Capital Natural Resource Fund II - Ordinary Business Income (loss) - 1,869. Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) - 7,820. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) - 7,820. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) - 49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) - 791,686. Paul Capital Partners VIII-A, LP - Ordinary Business	-	-390,928.
Closs Forester Partners, LP - Ordinary Business Income (loss 797,340. Great Hill Equity Partners VI, LP - Ordinary Business 797,340. Great Hill Equity Partners VI, LP - Ordinary Business 795,430.	Encap Energy Capital Fund IX - Ordinary Business Income (loss)	·
Great Hill Equity Partners VI, LP - Ordinary Business Income (loss) -95,430 Ordinary Business Income (loss) -1,875. Highfields Capital IV LP - Ordinary Business Income (loss) -335. Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los -5. Lyme Forest Fund TE - Ordinary Business Income (loss) -386. Lyme Forest Fund III TE - Ordinary Business Income (loss) -33. Oaktree Opportunities Fund VIII LP - Ordinary Business Income (loss) -608. Oaktree Opportunities Fund VIIIB - Ordinary Business Income (loss) -736. Oaktree Opportunities Fund XB - Ordinary Business Income (loss) -210. Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) -44. Park St Capital Natural Resource Fund II - Ordinary Business Income (loss) -305. Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) -1,869. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -7,820. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -91,686. Paul Capital Partners VIII-A, LP - Ordinary Business		-578,949.
Income (loss) -95,430 Ordinary Business Income (loss) -1,875. Highfields Capital IV LP - Ordinary Business Income (loss) -335. Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los -5. Lyme Forest Fund TE - Ordinary Business Income (loss) -386. Lyme Forest Fund III TE - Ordinary Business Income (loss) -386. Lyme Forest Fund VIII LP - Ordinary Business Income (loss) -608. Oaktree Opportunities Fund VIIIB - Ordinary Business Income (loss) -736. Oaktree Opportunities Fund XB - Ordinary Business Income (loss) -736. Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss -210. Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss) -305. Park St Capital Natural Resource Fund II - Ordinary Business Income (loss) -305. Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) -1,869. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -91,686. Paul Capital Partners VIII-A, LP - Ordinary Business		797,340.
Highfields Capital IV LP - Ordinary Business Income (loss) Knightbridge Venture Capital VI LP Series VC - Ordinary Business Income (los -5. Lyme Forest Fund TE - Ordinary Business Income (loss) -386. Lyme Forest Fund III TE - Ordinary Business Income (loss) -333. Oaktree Opportunities Fund VIII LP - Ordinary Business Income (loss) -608. Oaktree Opportunities Fund VIIIB - Ordinary Business Income (loss) -736. Oaktree Opportunities Fund XB - Ordinary Business Income (loss) -736. Oaktree Opportunities Fund XB AIF (Cayman) - Ordinary Business Income (loss -44. Park St Capital Natural Resource Fund III - Ordinary Business Income (loss) -305. Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) -1,869. Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -91,686. Paul Capital Partners VIII-A, LP - Ordinary Business	Income (loss)	
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Business Income (loss) Park St Capital Natural Resource Fund IV - Ordinary Business Income (loss) Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) Paul Capital Partners VIII-A, LP - Ordinary Business	Business Income (loss)	-305.
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Park St Capital Natural Resource Fund V - Ordinary Business Income (loss) -49,215. Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) -91,686. Paul Capital Partners VIII-A, LP - Ordinary Business		7.820.
Business Income (loss) Park St Capital Natural Resource Fund VI - Ordinary Business Income (loss) Paul Capital Partners VIII-A, LP - Ordinary Business		7,0200
Business Income (loss) -91,686. Paul Capital Partners VIII-A, LP - Ordinary Business	Business Income (loss)	-49,215.
Paul Capital Partners VIII-A, LP - Ordinary Business		04 666
		-91,686.
		42.

New	Hampshire	Charitable	Foundation
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02-	6	0	0	5	6	2	5
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New Hampshire Charitable Fou	macion	02-60056	
Spur Ventures II, LP - Ordina	ary Rusiness Income (loss)		2.
Spur Ventures III, LP - Ordin		-12	
TrueBridge Bain 2014 Special E			
Income (loss)	1	53	7.
TrueBridge BVP VIII Special Pu	rpose - Ordinary Business		
Income (loss)		—	4.
TrueBridge Capital Partners Fu	ınd V - Ordinary Business		
Income (loss)		-45	8.
TrueBridge-Kauffman Fellows Er	ndowment Fund II, L.P	0.0	^
Ordinary Business Inco		-23	9.
TrueBridge-Kauffman Fellows Er Ordinary Business Inc	dowment rund III, L.P	-33	1
TrueBridge-Kauffman Fellows Er	dowment Fund IV I.P -	-55	⊥•
Ordinary Business Inco	idowinciie i diid iv, ii-i	-79	5.
The Varde Fund VIII - Ordinary	Business Income (loss)	-2	
The Varde Fund IX - Ordinary F		_ _9	
The Varde Fund X(B) (Feeder) -			
(loss)	_	-10,11	
Vox Health Fund - Ordinary Bus		-68	5.
Weathergage Venture Capital, I	GP - Ordinary Business Income		
(loss)	1	1,90	5.
Weathergage Venture Capital IV	7, LP - Ordinary Business	0	^
<pre>Income (loss) Westbrook Real Estate Fund X -</pre>	Ordinary Businass Insana	-9	8.
	- Ordinary Business income	40.04	
(1066)		40 24	9
(loss)		40,24	9.
Total Included on Form 990-T,	Page 1, line 5	-591,22	
	Page 1, line 5		
	Page 1, line 5 Contributions		
Total Included on Form 990-T,		-591,22	5 ·
Total Included on Form 990-T, Form 990-T Description/Kind of Property	Contributions Method Used to Determine FMV	-591,22 Statement Amount	3
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities	Contributions Method Used to Determine FMV N/A	-591,22 Statement Amount 34,490,90	3
Total Included on Form 990-T, Form 990-T Description/Kind of Property	Contributions Method Used to Determine FMV N/A	-591,22 Statement Amount	3
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1	Contributions Method Used to Determine FMV N/A Line 20	-591,22 Statement Amount 34,490,90	3
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities	Contributions Method Used to Determine FMV N/A	-591,22 Statement Amount 34,490,90	3
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1	Contributions Method Used to Determine FMV N/A Line 20	-591,22 Statement Amount 34,490,90	3
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1 Form 990-T Description	Contributions Method Used to Determine FMV N/A Line 20	-591,22 Statement Amount 34,490,90 34,490,90 Statement Amount	5. 3 9. 9. 4
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1 Form 990-T Description Tax Return Prep (allocated)	Contributions Method Used to Determine FMV N/A Line 20	-591,22 Statement Amount 34,490,90 34,490,90 Statement Amount 3,93	5. 3 9. 9. 4
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1 Form 990-T Description	Contributions Method Used to Determine FMV N/A Line 20 Other Deductions	-591,22 Statement Amount 34,490,90 34,490,90 Statement Amount 3,93 73,89	3 9. 9. 9. 4
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1 Form 990-T Description Tax Return Prep (allocated) Investment Fees (allocated)	Contributions Method Used to Determine FMV N/A Line 20 Other Deductions	-591,22 Statement Amount 34,490,90 34,490,90 Statement Amount 3,93	3 9. 9. 9. 4
Total Included on Form 990-T, Form 990-T Description/Kind of Property Various Public Charities Total to Form 990-T, Page 1, 1 Form 990-T Description Tax Return Prep (allocated) Investment Fees (allocated)	Contributions Method Used to Determine FMV N/A Line 20 Other Deductions	-591,22 Statement Amount 34,490,90 34,490,90 Statement Amount 3,93 73,89	3 9. 9. 4 8. 9.

Form 990-T	Contributions Sur	nmary	Statement	5
Qualified Contr	ributions Subject to 100% Lir	nit		
Carryover of Pi	rior Years Unused Contribution	ons		
For Tax Year	- · · · · · · · · · · · · · · · · · · ·			
For Tax Year				
For Tax Year				
For Tax Year				
For Tax Year	2017 36,479,3	372		
Total Carryove	<u></u>	153,246,690		
	Year 10% Contributions	34,490,909		
	tions Available Limitation as Adjusted	187,737,599 0		
Excess 10% Cont		187,737,599		
Excess 100% Cor Total Excess Co		0 187,737,599		
Allowable Contr	ributions Deduction			0
Total Contribut	cion Deduction			0

Form 990-T	Net	Operating Loss	Deduction	Statement 6	
Tax Year	Loss Sustained	Loss Previously Applied	Loss Remaining	Available This Year	
12/31/15 12/31/17	36,386. 105,759.	36,386.	0. 105,759.	0. 105,759.	
NOL Carryov	er Available This	Year	105,759.	105,759.	

SCHEDULE M (Form 990-T)

Unrelated Business Taxable Income for Unrelated Trade or Business

Entity

OMB No. 1545-0687

Department of the Treasury Internal Revenue Service (99)

Name of the organization

► Go to www.irs.gov/Form990T for instructions and the latest information.

New Hampshire Charitable Foundation

For calendar year 2018 or other tax year beginning

Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3).

501(c)(3) Organizations Only

Employer identification number

02-6005625

	Inrelated business activity code (see instructions) $ ightharpoonup 54190$ bescribe the unrelated trade or business $ ightharpoonup Other\ Pro$	0 fes	<u>sio</u> nal Servio	ces	
	t I Unrelated Trade or Business Income	(A) Income		(B) Expenses	(C) Net
1a	Gross receipts or sales 55,232.				
b	Less returns and allowances	1c	55,232.		
2	Cost of goods sold (Schedule A, line 7)	2			
3	Gross profit. Subtract line 2 from line 1c	3	55,232.		55,232.
4 a	Capital gain net income (attach Schedule D)	4a			
b	Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)	4b			
С	Capital loss deduction for trusts	4c			
5	Income (loss) from a partnership or an S corporation (attach				
	statement)	5			
6	Rent income (Schedule C)	6			
7	Unrelated debt-financed income (Schedule E)	7			
8	Interest, annuities, royalties, and rents from a controlled				
	organization (Schedule F)	8			
9	Investment income of a section 501(c)(7), (9), or (17)				
	organization (Schedule G)	9			
10	Exploited exempt activity income (Schedule I)	10			
11	Advertising income (Schedule J)	11			
12	Other income (See instructions; attach schedule)	12			
13	Total. Combine lines 3 through 12	13	55,232.		55,232.
Pa	Deductions Not Taken Elsewhere (See instruction deductions must be directly connected with the unit of the connected with the unit of the connected with the connecte				pt for contributions,
14	Compensation of officers, directors, and trustees (Schedule K)				14
15	Salaries and wages				15
16	Repairs and maintenance				16
17	Bad debts			<u> </u>	17
18	Interest (attach schedule) (see instructions)				18
10	Tayon and licenses				10

For Paperwork Reduction Act Notice, see instructions.

Unrelated business taxable income. Subtract line 31 from line 30

Charitable contributions (See instructions for limitation rules)

Depreciation (attach Form 4562) Less depreciation claimed on Schedule A and elsewhere on return

Excess readership costs (Schedule J)

Contributions to deferred compensation plans

Excess exempt expenses (Schedule I)

Employee benefit programs

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

Other deductions (attach schedule) See Statement

Total deductions. Add lines 14 through 28

Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13

Schedule M (Form 990-T) 2018

20,393.

20,393.

34,839.

20

22b

23

24

25

26

27

28

29 30

20 21

22 23

24 25

26

27

28

29

30

31

Page 3

New Hamps	shire Ch	aritable	Foundation		02-6005	625
Schedule A - Cost of Good	ds Sold. Enter	method of inve	entory valuation 🕨 N/A			
1 Inventory at beginning of year	1		6 Inventory at end of year	ır		6
2 Purchases			7 Cost of goods sold. St			
3 Cost of labor	3		from line 5. Enter here			
4a Additional section 263A costs						7
(attach schedule)			8 Do the rules of section	,	•	Yes No
b Other costs (attach schedule)			property produced or a	•	,	1 1
5 Total. Add lines 1 through 4b		D	the organization?		I W/H- D I D	X
Schedule C - Rent Income (see instructions)	(From Real	Property ar	na Personai Property	Leas	ed with Real Prop	erty)
Description of property						
(1)						
(2)						
(3)						
(4)	0 5	 				
(2) [red or accrued	1 d		3(a) Deductions directly of	connected with the income in
(a) From personal property (if the personal property is more 10% but not more than 50%)	re than	` 'of rent for	I and personal property (if the percent personal property exceeds 50% or if ent is based on profit or income)	age	columns 2(a) and	2(b) (attach schedule)
(1)						
(2)						
(3)						
(4)						
Total	0.	Total		0.		
(c) Total income. Add totals of columns here and on page 1, Part I, line 6, colum	s 2(a) and 2(b). Er in (A)	nter		0.	(b) Total deductions. Enter here and on page 1, Part I, line 6, column (B)	• 0
Schedule E - Unrelated De			e instructions))	
		,	<u> </u>		3. Deductions directly conne	
			Gross income from or allocable to debt-	(2)	to debt-finance	(b) Other deductions
1. Description of debt-f	financed property		financed property	(α)	(attach schedule)	(attach schedule)
(1)						
(2)						
(3)						
(4)						
 Amount of average acquisition debt on or allocable to debt-financed property (attach schedule) 	of or a debt-fina	e adjusted basis allocable to anced property h schedule)	6. Column 4 divided by column 5		7. Gross income reportable (column 2 x column 6)	8. Allocable deductions (column 6 x total of columns 3(a) and 3(b))
(1)			%			
(2)	1		%			
(3)			%			
(4)			%			
	•		,,		inter here and on page 1,	Enter here and on page 1,
				'	Part I, line 7, column (A).	Part I, line 7, column (B).
Totals			>		0.	0
Total dividends-received deductions i	ncluded in columi	n 8				0

Form **990-T** (2018)

Form 990-T (M)	Other Deductions	Statement	7
Description		Amount	
Allocated overhead		20,39	93.
Total to Schedule M, Part	: II, line 28	20,39	93.

New Hampshire Charitable Foundation Controlled Foreign Partnership Reporting

Investor:

New Hampshire Charitable Foundation 37 Pleasant Street Concord NH, 03301 TIN: 02-6005625

The above investor is required to furnish information with respect to its indirect ownership in the following partnerships with its federal income tax return for the year ended December 31, 2018, pursuant to Internal Revenue Code §6038:

Name and Tax ID# of Foreign Partnership

Resource Capital Fund VI, L.P. (EIN: 98-1091392)

The filing obligations will be satisfied by CA Resources Fund (U.S. Taxable), L.P. – Series Resource Capital VI (the "Fund"). The Fund will attach Form 8865 to its Form 1065 which will be filed with the Internal Revenue Service Center in Ogden, UT 84201-0011.

CA Resources Fund (U.S. Taxable), L.P. – Series Resource Capital VI's tax identification number is 46-1910329 and its address is:

125 High Street Boston, MA 02110

A copy of the Form 8865 that satisfied your filing requirements is available upon request. The rules surrounding Internal Revenue Code §6038 are complex. Please consult your tax advisor.

EIN: 02-6005625

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 , 2018, and ending **DEC** 31 , 2018 OMB No. 1545-1668

Name of person filing this return				Filer's identifi		:		
Now Homoshima Chamitahi	la Eaundation			02-60	05625			
New Hampshire Charitab Filer's address (if you aren't filing this form with your ta		A Catagonia	of filer (see Categories of File	ua ia tha iaatuuatia	one and shoot on	nliachla hay(ac))		
37 Pleasant Street	x return)	A Category C				Jilcable box(es)).		
		B Filer's tax year JAN 1 , 2018, and ending DEC 31, 2018						
Concord, NH 03301-4005	0 10 1					31, 2018		
C Filer's share of liabilities: Nonrecourse \$	Qualified nonre		-	Otn	ier \$			
D If filer is a member of a consolidated group but not t	ne parent, enter the following	information ab		INI				
Name				IN				
Address		0:						
E Check if any excepted specified foreign financial ass	•	See instruction	S					
F Information about certain other partners (see instruc	cuoris)				(4) Check applica	hlo hov(oo)		
(1) Name	(2) Address		(3) Identification numb	ner -		Constructive owner		
				Category	1 Category 2	Constructive owner		
Od Name and address of femiliar marks such in				2(a) El	l I N (if any)			
G1 Name and address of foreign partnership				1 ' '	8-1301	005		
Benefit Street Partners	rnogial			_	eference ID nur			
Situations Fund (Cayma				U-8		11001		
9 West 57th Street, Suite						se laws organized		
New York, NY 10019	5 4920				an Isla	•		
	Principal business	7 Principal bus	siness	Functional currency				
4 Date of organization 5 Principal place of business 04/13/2016 Cayman Islands	6 Principal business activity code number 5 2 3 9 0 0	'activity [nvestm	ents US	currency	(see in	nge rate istructions) • 0 0 0 0 0 0		
H Provide the following information for the foreign par			erreb pb			• • • • • • • •		
1 Name, address, and identification number of agent (2 Check if th	ne foreign partnership n	nust file:				
Benefit Street Partners,			· · · ·		X Form 106	5		
9 West 57th Street, Suite			enter where Form 1065			·		
New York, NY 10019		E-fi		io inica.				
3 Name and address of foreign partnership's agent in	country of organization, if any		ddress of person(s) with cu and the location of such be	stody of the books	and records of the	ne foreign		
Maples Corporate Services			t Street P					
Ugland House, P.O. Box 3		1	57th Stre			0		
George Town, Grand Cayman		I		019				
5 During the tax year, did the foreign partnership pa								
allowed under section 267A? See instructions		-		•	Yes	X No		
If "Yes," enter the total amount of the disallowed d				• • • • • • • • • • • • • • • • • • •	 \$			
6 Is the partnership a section 721(c) partnership, as			.721(c)-1T(b)(14)?	····	Yes	X No		
7 Were any special allocations made by the foreign				>	X Yes	☐ No		
8 Enter the no. of Forms 8858, Info Return of U.S. Persons W		Entities (FDEs) ar	nd Foreign Branches (FBs),	ttached to this return	>	0		
9 How is this partnership classified under the law of	the country in which it's organ	nized?		▶ Part	nershi	ρ		
10a Does the filer have an interest in the foreign partner	ership, or an interest indirectly	through the fo	reign partnership, that					
unit under Reg. 1.1503(d)-1(b)(4) or part of a con	nbined separate unit under Re	g. 1.1503(d)-1	(b)(4)(ii) ? If "No," skip o	uestion 10b	Yes	X No		
b If "Yes," does the separate unit or combined separ	ate unit have a dual consolidat	ed loss, as def	ined in Reg. 1.1503(d)-	1(b)(5)(ii)?	Yes	☐ No		
11 Does this partnership meet both of the following r)					
1. The partnership's total receipts for the tax year 2. The value of the partnership's total assets at the	were less than \$250,000. e end of the tax year was less t	han \$1 million		>	Yes	☐ No		
If "Yes," don't complete Schedules L, M-1, and M-	,	nαn φτ million.	J					
Sign Here Only Under penalties of perjury, I declare that I have earlier from the filling correct, and complete. Declaration of preparer (correct, and complete.)								
This Form	anor man goneral partiter of illiffied	naominy company	onibor, is based on all IIII	ormanon or WillCII	propertinds ally	mowicage.		
Separately and Not With Your								
Tax Return. Signature of general partner or limited liab	ility company member					Date		
Paid Print/Type preparer's name	Preparer's signature		Date	Check] if PTIN			
Preparer Nicholas E. Porto			10/31/	19 self-employ		310283		
Hirm's name Baker Newma	an & Noyes		<u>. </u>	Firm's EIN	01-04	94526		
Only Firm's address ►Box 507				Phone no.				
Portland, ME 04112				(2	07) 87	9-2100		

810652 12-26-18

27

28

29

28

29

Total balance due. Add lines 23 through 27

Overpayment. If line 28 is larger than line 27, enter overpayment

Amount owed. If line 28 is smaller than line 27, enter amount owed

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		, ,	~1		-				Filer's ident			
Name of foreign n						Foundati		EIN (if any)	02-6	00562		har (aga ingtr)
Name of foreign p	partifiership Be					ers Speci		98-130	1005	U-8	e iD ilulii	ber (see instr)
1 a lo the portr	acrabia a castion 7					Cayman),		1			Yes	X No
						Regulations sections gain upon the conti	. ,	. , . , ,			Yes	No No
						at the time of the tr					165	L INU
						1.482-7(c)(1)?				Г	Yes	X No
	ransfers Reportab					1 11 102 7 (0)(1)1						
Type of property	(a) Date of transfer	(b) Description of property	Fair ma	(c) rket value of transfer		(d) Cost or other basis		(e) ery period	(f) Section 70 allocation me			(g) ecognized transfer
Cash	12/31/18		506	,666.								
Stock, notes	12/31/10			, , , , , ,								
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			50	6,666.								
	ransferor's percent					he transfer •	5695	%	(b) After	the transf	er •	5724 %
	formation Require					_	_					
						interest	in E	<u>Benefit</u>	Stree	t Pai	rtner	s
Speci	al Situa	tions	Fund	(Caym	an)), L.P.						
Part II D	ispositions Report	ahle linder	Section 60	38B								
(a)	(b)	1	(c)	(d)		(e)		(f)	(g)			(h)
Type of property	Date of original		Date of position	Manner of disposition		Gain recognized by	De	(f) epreciation ecapture	Gain alloc to parti			eciation
property	transfer		position	dioposition		partnership	re by p	cognized partnership	l to parti			re allocated partner
						nition under section	904(f)(3)	or section 904		>	Yes	
LHA For Papers	work Reduction Ac	t Notice, se	e the Instru	ctions for Fo	rm 88	65.				Schedule	O (Form 8	865) 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

Department of the Treasury Internal Revenue Service

beginning JUN 1 , 2018, and ending DEC OMB No. 1545-1668

Maine of person in	ing this return							
Now Us	mpshire Charital	olo Foundation			02-	-60056	4 5	
	nupshire charical		A Catagony of fi	ler (see Categories of File	ro in the inc	tructions and	ohook appli	icable boy(ca)):
, ,	ant Street	iax return)	A Category of it		3 🛚 🗓		спеск аррік	cable box(es)).
Concord,			B Filer's tax year beginning	<u> </u>			DEC	31, 2018
		0!:6			<u>ZUIO,</u>		DEC	31, 2016
	liabilities: Nonrecourse \$		ecourse financing	•		Other \$		
	ber of a consolidated group but no	t the parent, enter the following	information abour					
Name				El	N			
Address								
	cepted specified foreign financial a	•	See instructions					<u></u>
F information ab	out certain other partners (see instr	ucuons)				(4) Chas	k applicable	a h av/aa)
	(1) Name	(2) Address		(3) Identification numb	er Cod		'''	. ,
	···				Cai	tegory 1 Cate	egory 2 C	Constructive owner
						-+		
04.11					2/	a) EIN (if an		
G1 Name and add	ess of foreign partnership				2(.1878	E 2
02/2+200	Opportunities Fu	nd VD I D			2/1	b) Reference		_
Oaktiee	opportunities F	IIIU AB, LI.P.			Ι,	J-46.1		761
333 Cout	h Grand Avenue,	28+h Eloor						laws organized
Los Ange		Z0CII F1001				yman		•
Date of	Principal place	• Principal business	→ Principal busin	ess lo		.yman	Exchanc	ne rate
4 Date of organization	5 Principal place of business 18Cayman Islands	6 Principal business activity code number 5 2 3 9 0 0	7 Principal busin activity Investme	nts US	Functiona currency	11 8b	(See IIISt	0 0 0 0 0 0 0
	lowing information for the foreign p		IIIvescille	1105 051				00000
	, and identification number of agen		2 Chock if the	foreign partnership m	uet file:			
	Capital Manageme				m 8804	X Fc	orm 1065	
	h Grand Avenue,			er where Form 1065		_ <u>21</u> _10	1111 1003	
Los Ange	=	20011 1 1001	Jeivice Cent	er where rollin 1005	is ilieu.			
	ress of foreign partnership's agent	in country of organization if any	Name and add	ress of person(s) with cus nd the location of such bo	stody of the	books and rec	ords of the	foreign
	Corporate Service		Oaktree	Capital 1	Manao	ras, il dillerer rement	T	Ρ.
27 Hospi				th Grand				
_	own, Grand Cayma	an Cavman Isla			9007	-	-	
	x year, did the foreign partnership	_						
=			-			▶ □	Yes	X No
	r the total amount of the disallowed					• \$		
	rship a section 721(c) partnership,					• <u> </u>	Yes	X No
-	ecial allocations made by the foreig	n northerchin?		. , , , , ,		\triangleright X	Yes	No
	Forms 8858, Info Return of U.S. Persons				tached to this i			
	artnership classified under the law			. , , , ,		rtner	ship	
10a Does the file	r have an interest in the foreign par	tnership, or an interest indirectly	through the forei	gn partnership, that's				
	eg. 1.1503(d)-1(b)(4) or part of a c		-				Yes	X No
	the separate unit or combined sep	·	- , , , ,				Yes	☐ No
11 Does this pa	rtnership meet both of the following	g requirements?	,	` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	()()()			
1. The partne	ership's total receipts for the tax year of the partnership's total assets at t	ar were less than \$250,000.	han ¢1 million	l l			Yes	□ No
	t complete Schedules L, M-1, and N		iiaii ֆ i iiiiiiioii.	<u> </u>				
,	er penalties of perjury, I declare that I hav							
if You're Filing corr This Form	ect, and complete. Declaration of prepare	r (other than general partner or limited	iiability company me	ember) is based on all info	ormation of t	vilich preparer	nas any kn	iowieage.
Separately and Not With Your								
Tax Return.	Signature of general partner or limited l	liability company member					Dat	te
Paid Print	/Type preparer's name	Preparer's signature		Date	Check	, I P	PTIN	
INT -i	cholas E. Porto			10/31/			P013	10283
riepaiei 🚐		man & Noyes			Firm's EIN		-049	
Only Firm	n's address ▶Box 507	-			Phone no			
OHIV	rtland ME 0411)			•		879	-2100

810652 12-26-18

28

29

Form 8865 (2018)

Amount owed. If line 28 is smaller than line 27, enter amount owed

Overpayment. If line 28 is larger than line 27, enter overpayment

28

29

SCHEDULE O (Form 8865)

(Rev. December 2018)
Department of the Treasury
Internal Revenue Service
Name of transferor

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

Ivanic of transicio	·-	mpshi	re Charital	ole Fou	ındatio	n	02-600	· •
Name of foreign p			Opportunit			L。 EIN (if any)		eference ID number (see instr)
b If "Yes," wa2 Was any in	s the gain deferral tangible property to	method app ransferred c	rship (as defined in Ten lied to avoid the recogn onsidered or anticipated defined in Regulations	ition of gain up I to be, at the t	pon the contributime of the trans	ution of property? sfer or at any	See instructions	Yes No
	ransfers Reportabl			36611011 1.402	7(6)(1)!			163 <u>X</u> NO
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d Cost of bas	r other	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized d on transfer
Cash	12/31/18		608,571.					
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			608,571					
Supplemental Inf	ormation Required deration	d To Be Rep	in the partnership: (a) E	efore the trans		000 % in Oaktree	(b) After the	transfer .0690 %
Part II D	ispositions Report	able Under	Section 6038B					
(a) Type of property	(b) Date of original transfer		(c) (d) ate of Manner of disposition	on rec	(e) Gain ognized by artnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	t (h) Depreciation recapture allocated to partner
			schedule subject to gain		nder section 90	4(f)(3) or section 904	(f)(5)(F)?	Yes No
LHA For Papers	work Reduction Ac	t Notice, se	e the Instructions for F	orm 8865.			Sch	edule O (Form 8865) 12-2018

Form 8865	Certain Partners of Foreign	Partnership	Statement	t 8
Name	Address	Identifying Number	Check if Foreign Per	
Ascension Alpha Fund, LLC	101 S. Hanley Rd, Ste 200	90-0786464		
Ascension Hlth Mstr Pnsion	St. Louis, MO 63105 101 S. Hanley Rd, Ste 200	36-6891022		
Howard Hughes Medical Inst	St. Louis, MO 63105 2711 Centerville Rd	59-0735717		
medical inst	Wilmington, DE 19808			
Form 8865	Affiliation Schedule		Statement	t 9
Name	Address	Identifying Number	Total Ordinary Income or (Loss)	Ck if For- eign P'sh
BSP Special Sit. Master A	9 West 57th St., Ste. 4920	81-2178751	0.	
BSP Special Sit. Master B	New York, NY 10019 9 West 57th St., Ste. 4920 New York, NY 10019	81-2243859	0.	
Form 8865	Affiliation Schedule		Statement	t 10
Name	Address	Identifying Number	Total Ordinary Income or (Loss)	Ck if For- eign P'sh
Oaktree Opp FD XB Cayman	333 South Grand Avenue	98-1412648	0.	х
Oaktree Opp FD XB Delaware	Los Angeles, CA 90071 333 South Grand Avenue	82-4547786	0.	
	Los Angeles, CA 90071	83-2273701		
OCM Montrose Holdings	333 South Grand Avenue	03-2273701	0.	
	333 South Grand Avenue Los Angeles, CA 90071 333 South Grand Avenue Los Angeles, CA 90071	83-1520028	0.	

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

Part I U.S. Transferor Information (see instructions)							
Name of transferor		Identifying number (see instructions)					
New Hampshire Charitable Foundation							
		02-6	005				
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corpo	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	X	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	Ider	Identifying number					
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	corporation?		Yes	X	No		
If not, list the name and employer identification number (EIN) of the parent corporation.							
Name of parent corporation	EIN of	parent co	rporati	on			
N/A							
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 secti	ion 367),					
complete questions 3a through 3d.							
a List the name and EIN of the transferor's partnership.							
Name of partnership	FIN	l of partne	ershin				
Hume of paranetomp	Liiv	or partir	oi oiiip				
27 / 2							
N/A							
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 establi	ished				1		
securities market?		<u></u>	Yes		No		
Part II Transferee Foreign Corporation Information (see instructions)	1						
4 Name of transferee (foreign corporation)	5a l	dentifying	g numb	er, if a	any		
AACD Mars Essenat Transactions III ID	4-	42025	1 (1				
AACP Tax Exempt Investors III, LP	<u> </u>	42827		_			
6 Address (including country)	5b F	Reference	ID num	ıber			
One Embarcadero Center, 16th Floor	00	6 6					
San Francisco, CA 94111	92	6-6					
7 Country code of country of incorporation or organization							
CJ							
8 Foreign law characterization (see instructions)							
Limited Partnership			.,	v	1		
9 Is the transferee foreign corporation a controlled foreign corporation?		<u> </u>	Yes	<u> </u>			
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.		Forr	n 926 (1	кеv. 1	1-2018)		

Section A - Cash	Regarding Tran	sfer of Property (see	instructi	ons)		Ţ.
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2018			155,696.		
10 Was cash the only pro-	ainder of Part III and g					X Yes No
Section B - Other Pro	, 	<u> </u>	/ subjec		` ''	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
 Totals						
 12 a Were any assets of a foreign corporation? If "Yes," go to line 12. b Was the transferor a continue to limit of the transferee foreign corporation. c Immediately after the transferee foreign corporation. d Enter the transferred. 13 Did the transferor transfer skip Section continue. 	foreign branch (included) b. domestic corporation nat is a foreign disregatine 12c. If "No," skip I transfer, was the done poration? ine 12d. If "No," skip I loss amount included asfer property describ C and questions 14a to	that transferred substantial urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shimmer 12d, and go to line 13. in gross income as required ed in section 367(d)(4)? hrough 15.	ly all of the 0%-owne o line 13. areholder	e assets of a fore d foreign corpora with respect to the ection 91 \$\bigsec\square\$	ferred to a ign branch ition?	Yes No Yes No Yes No Yes No Yes No
Section C - Intangibl	e Property Subje	ect to Section 367(d)				_
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
					_	
Property described in sec. 367(d)(4)						
Totals						Form 926 (Rev. 11-2018)

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	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?		No
	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	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
Sup	plemental Part III Information Required To Be Reported (see instructions)		
	nsideration received consisted of interest in AACP Tax E	xempt Invest	ors
	I, LP.		
	·		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
I a	Additional information regarding transfer of Froperty (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
10	(a) Before 1.606% (b) After 1.606%		
17	Type of nonrecognition transaction (see instructions) > 351		
17 40	Indicate whether any transfer reported in Part III is subject to any of the following.		
18			X No
a	Gain recognition under section 904(f)(3)		X No
b	Gain recognition under section 904(f)(5)(F)		
С	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	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)	> \$	
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		

Yes

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

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
New Hampshire Charitable Foundation	02-6005625
Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	
2 If the transferor was a corporation, complete questions 2a through 2d.	If tes NO
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) k	ov.
	77
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).	165
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corp If not, list the name and employer identification number (EIN) of the parent corporation.	oration? Yes X No
Name of parent corporation	EIN of parent corporation
N7 / 2	
N/A	Yes X No
d Have basis adjustments under section 367(a)(4) been made?	L Yes A NO
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such	a under section 367\
complete questions 3a through 3d.	runder section 307),
a List the name and EIN of the transferor's partnership.	
a List the name and Lin of the transferor's partnership.	
Name of partnership	EIN of partnership
N/A	
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
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
AACP Tax Exempt Investors IV, LP	475229744
6 Address (including country)	5b Reference ID number
One Embarcadero Center, 16th Floor	
San Francisco, CA 94111	926-4
7 Country code of country of incorporation or organizationCJ	
8 Foreign law characterization (see instructions) Limited Partnership	
9 Is the transferee foreign corporation a controlled foreign corporation?	Yes X No
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.	Form 926 (Rev. 11-2018)

	Regarding Tran	sfer of Property (see i	instructi	ions)		
Section A - Cash			_			
Type of	(a) Date of	(b) Description of	Fair m	(c) narket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property	dat	e of transfer	basis	transfer
Cash	12/31/2018		1,	598,406.		
10 Was cash the only pro If "Yes," skip the rema		jo to Part IV.				X Yes No
Section B - Other Pro	perty (other tha	n intangible property	subjec	t to section 36		
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on te of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
•						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
			_			
Totals						
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 transferee foreign corporation of the transferee foreign corporation of the transferee of the transferred of the trans	foreign branch (included) domestic corporation at is a foreign disregate transfer, was the domporation? ne 12d. If "No," skip liter and the control of the	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transfer	branch	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(a)			1	1
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer
			-			
			+			
Duan autor ala a avila a al			+			+
Property described in sec. 367(d)(4)			+			
III Sec. 307 (a)(4)						
			+	1		+
	 		+			
	 		+	 		+
Totals						
1000					F	Form 926 (Rev. 11-2018)

Forn	n 926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	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?		No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	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 No
	oplemental Part III Information Required To Be Reported (see instructions)	rompt Thirogh	- 0 20 4
	nsideration received consisted of interest in AACP Tax-E , LP.	xempt invest	JOLS
<u> </u>	, 11.		
Pa	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		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b			X No
С			X No
	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.		
h	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)	> \$	
c		🚩 Ψ	
Ü	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	□ No
	p. 125.1, 2004 in the defination of old had a backhood and in hogalations decided 1.007 (c) 2(b)(2):	— • • • • • • • • • • • • • • • •	

Yes

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

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB	No.	1545-0026

Part I U.S. Transferor Information (see instructions)			
Name of transferor		Identifying numb	er (see instructions)
New Hampshire Charitable Foundation			
		02-6005	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	oration?	L 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 36	88(c)) by		
five or fewer domestic corporations?			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	Ide	ntifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent foot, list the name and employer identification number (EIN) of the parent corporation.	t corporation?	Yes	X No
Name of parent corporation	EIN of	parent corporati	ion
N/A			
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 a	s such under sect	ion 367),	
complete questions 3a through 3d.			
a List the name and EIN of the transferor's partnership.			
Name of partnership	EIN	l of partnership	
N/A			
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	L 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 estab	lished		
securities market?		Yes	└── No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)	5a I	dentifying numb	er, if any
AACP Tax Exempt Investors V, LP		1817524	
6 Address (including country) One Embarcadero Center, 16th Floor	5b F	Reference ID num	iber
	0.2	6 5	
San Francisco, CA 94111	92	6-5	
7 Country code of country of incorporation or organization CJ			
8 Foreign law characterization (see instructions) Limited Partnership			
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	X No
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.			Rev. 11-2018

	Regarding Trans	sfer of Property (see i	nstructi	ons)		
Section A - Cash	1 (a)	/la\		(a)	(al)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2018			239,385.		
10 Was cash the only pro	ainder of Part III and g					X Yes No
Section B - Other Pro	, 		subjec			(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities			+			
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
12 a Were any assets of a 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 13 Did the transferor tran If "No," skip Section C	foreign branch (included) domestic corporation at is a foreign disregation at 12c. If "No," skip litransfer, was the domporation? ne 12d. If "No," skip litransfer included asfer property describ and questions 14a to	that transferred substantiall rded entity) to a specified 1 nes 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owned line 13. areholder	rded entity) transfe e assets of a foreign d foreign corporation with respect to the	n branch	Yes No Yes No Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(d)				
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						
I Utalo				l	F	<u></u>

Form	1926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	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		No No
	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)(i) \$\bigsim \frac{\text{\$\text{\$}}}{\text{\$\text{\$}}}\$		
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)		
	nsideration received consisted of interest in AACP Tax-E	xempt Invest	ors
<u>V,</u>	LP.		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
ı a	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 0.883% (b) After 0.883%		
17	Type of nonrecognition transaction (see instructions) \blacktriangleright 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)		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
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)	▶\$	
	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		

Yes

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

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)						
Name of transferor		Identifying number (see instructions)				
New Hampshire Charitable Foundation		02-6005625				
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.	oration?	—	162	_2 <u>1</u> NO		
• • • • • •	29(a)) by					
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 36			V	X No		
five or fewer domestic corporations?			Yes Yes			
b Did the transferor remain in existence after the transfer?		<u>A</u>	Yes	∟ No		
If not, list the controlling shareholder(s) and their identifying number(s).						
Controlling shareholder	Ide	entifying n	umber			
c If the transferor was a member of an affiliated group filing a consolidated return, was it the paren	t corporation?		Yes	X No		
If not, list the name and employer identification number (EIN) of the parent corporation.						
Name of parent corporation	EIN o	f parent co	rporati	on		
N/A						
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 a	ıs such under sed	ction 367),				
complete questions 3a through 3d.						
a List the name and EIN of the transferor's partnership.						
Name of partnership	EI	N of partne	ership			
		-	-			
Cagtlolako IV ID	47-3497	Q 1 /I				
Castlelake IV, LP	<u> </u>					
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?			Yes	الا No الا		
c Is the partner disposing of its entire interest in the partnership?			Yes	X No		
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estab	olished			V		
securities market?		<u> </u>	Yes	X No		
Part II Transferee Foreign Corporation Information (see instructions)	1_					
4 Name of transferee (foreign corporation)	5a	Identifying	g numb	er , if any		
CL IV REO TE (Offshore) LLC		Deference	ID	.		
6 Address (including country) Mitchell House, P.O. Box 174	5b	Reference	חו num	per		
	ا م	26 1				
The Valley, B.W.I Anguilla	9	26-1				
7 Country code of country of incorporation or organization AV						
8 Foreign law characterization (see instructions) Corporation						
9 Is the transferee foreign corporation a controlled foreign corporation?		X	Yes	□ No		
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.				Rev. 11-2018)		

	Regarding Tran	sfer of Property (see in	structi	ons)					
Section A - Cash									
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer			
Cash	12/31/2018	pp,		160,840.					
10 Was cash the only pro	Was cash the only property transferred? X Yes No If "Yes," skip the remainder of Part III and go to Part IV.								
Section B - Other Pro	perty (other tha	n intangible property:	subjec	t to section 3	67(d))				
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer			
Stock and securities									
Inventory									
inventory									
Other property (not listed under									
another category)									
Property with									
built-in loss									
Totals									
recognition agreement 12 a Were any assets of a 1 foreign corporation?	t was filed? foreign branch (includ	es subject to section 367(a) w ding a branch that is a foreign	disrega	rded entity) transf	erred to a	Yes No			
(including a branch that If "Yes," continue to line	lomestic corporation at is a foreign disrega ne 12c. If "No," skip I	that transferred substantially arded entity) to a specified 10 ines 12c and 12d, and go to I	%-owne ine 13.	d foreign corporat	ion?	Yes No			
transferee foreign corp If "Yes," continue to li	ooration? ne 12d. If "No," skip	nestic corporation a U.S. shar ine 12d, and go to line 13.				Yes No			
	sfer property describ	in gross income as required ed in section 367(d)(4)?		ection 91 ► \$		Yes No			
Section C - Intangible	Property Subjection	ect to Section 367(d)							
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length prid on date of transf		(f) Income inclusion for year of transfer			
Property described									
in sec. 367(d)(4)						+			
V /V /									
			-		+	+			
Totals						Form 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) 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	No No No
	plemental Part III Information Required To Be Reported (see instructions) asideration received consisted of interest in CL IV REO	ME /Offshore	- \
$\frac{COI}{LL}$		TE (ULISHOF)	e <i>)</i>
ши	-•		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
ı u	Traditional information riogarating frameior of Froperty (000 inditional)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.539% (b) After 0.539%		
17	Type of nonrecognition transaction (see instructions) ► 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)		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
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.		
	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		

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

Yes

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

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.

Part I U.S. Transferor Information (see instructions)			
Name of transferor		Identifying numl	per (see instructions)
New Hampshire Charitable Foundation			
		02-6005	
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign co	rporation?	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?			☐ No
If not, list the controlling shareholder(s) and their identifying number(s).			
	1	Identifying number	
Controlling shareholder		identifying number	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the par If not, list the name and employer identification number (EIN) of the parent corporation.	ent corporation	? Yes	X No
Name of parent corporation	E	IN of parent corpora	tion
N/A			
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		r coation 267)	
	as such under	section sor),	
complete questions 3a through 3d.			
a List the name and EIN of the transferor's partnership.			
Name of partnership		EIN of partnership	
Castlelake V, LP	82-12	21295	
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	•	X Yes	□ 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 est			
securities market?		Yes	X No
Part II Transferee Foreign Corporation Information (see instructions)			
4 Name of transferee (foreign corporation)		5a Identifying numl	ber, if any
CL V Debt Solutions AIV LLC			
6 Address (including country)		5b Reference ID nur	nber
Mitchell House, P.O. Box 174			
The Valley, B.W.I Anguilla		926-2.1	
7 Country code of country of incorporation or organization			
AV 8 Foreign law characterization (see instructions)			
Corporation		177	
9 Is the transferee foreign corporation a controlled foreign corporation?		Yes	No No
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.		⊦orm 926	(Rev. 11-2018)

	Regarding Tran	sfer of Property (see	instructi	ions)		
Section A - Cash		6)				
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2018			145,437.		
10 Was cash the only pro	ainder of Part III and					X Yes No
Section B - Other Pro	operty (other that		/ subjec	(c)	(d)	(e)
Type of property	Date of transfer	(b) Description of property		narket value on e 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						
Totals						
recognition agreement 12 a Were any assets of a foreign corporation? If "Yes," go to line 12b b Was the transferor a d (including a branch the If "Yes," continue to lin c Immediately after the foreign corp If "Yes," continue to lin d Enter the transferred line	t was filed? foreign branch (included) domestic corporation at is a foreign disregation at is a foreign disregation at 12c. If "No," skip of transfer, was the doreoration? ne 12d. If "No," skip oss amount included asfer property describes and questions 14a.	that transferred substantial arded entity) to a specified 1 lines 12c and 12d, and go to nestic corporation a U.S. shalline 12d, and go to line 13. I in gross income as required and in section 367(d)(4)?	ly all of the 0%-owne o line 13. areholder	rded entity) transf e assets of a forei d foreign corpora with respect to th	gn branch	Yes No Yes No Yes No Yes No Yes No
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
Property described in sec. 367(d)(4)						
Totals						
						orm 926 (Rev. 11-2018)

Form	926 (Rev. 11-2018) New Hampshire Charitable Foundation	02-6005625	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) **Equipment**	Yes [No No No
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)		
	nsideration received consisted of interest in CL V Debt	Solutions AI	.V
LL(
Pa	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 0.326% (b) After 0.326%		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)		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
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.		
	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		

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

Yes

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

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

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

to a Foreign Corporation

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

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

OMB No.	1545-0026

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
New Hampshire Charitable Foundation	,
	02-6005625
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	ation? 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	
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 shareholder	Identifying number
e If the transferor was a member of an affiliated group filing a consolidated return, was it the parent	corporation? Yes X No
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent of If not, list the name and employer identification number (EIN) of the parent corporation.	corporation? res No
- Thou, list the name and employer identification number (Env) of the parent corporation.	
Name of parent corporation	EIN of parent corporation
N/A	
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 newtoneship
Name of partnership	EIN of partnership
Castlelake V, LP	82-1221295
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	Y y N -
c Is the partner disposing of its entire interest in the partnership?	Yes X No
	Yes X 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 establis securities market? 	Yes X 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 establish 	Yes X 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 establis securities market? 	Yes X 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 establis securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation)	Yes X 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 establis securities market? Part II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC	Yes X No Thed Yes X No Yes X No Sa Identifying number, if any
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 establis securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country)	Yes X 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 establis securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country) Mitchell House, P.O. Box 174	Yes X No Phed Yes X No Yes X No 5a Identifying number, if any 5b Reference ID number
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 establis securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country) Mitchell House, P.O. Box 174 The Valley, B.W.I Anguilla	Yes X No Thed Yes X No Yes X No Sa Identifying number, if any
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 establis securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country) Mitchell House, P.O. Box 174 The Valley, B.W.I Anguilla 7 Country code of country of incorporation or organization	Yes X No Phed Yes X No Yes X No 5a Identifying number, if any 5b Reference ID number
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 establist securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country) Mitchell House, P.O. Box 174 The Valley, B.W.I Anguilla 7 Country code of country of incorporation or organization AV	Yes X No Phed Yes X No Yes X No 5a Identifying number, if any 5b Reference ID number
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 establist securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country) Mitchell House, P.O. Box 174 The Valley, B.W.I Anguilla 7 Country code of country of incorporation or organization AV 8 Foreign law characterization (see instructions)	Yes X No Phed Yes X No Yes X No 5a Identifying number, if any 5b Reference ID number
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 establist securities market? Part II Transferee Foreign Corporation Information (see instructions) 4 Name of transferee (foreign corporation) CL V Ventures Offshore AIV LLC 6 Address (including country) Mitchell House, P.O. Box 174 The Valley, B.W.I Anguilla 7 Country code of country of incorporation or organization AV	Yes X No Yes X No Yes X No 5a Identifying number, if any 5b Reference ID number 926-2.2

Part III Information Section A - Cash	Regarding Tran	sfer of Property (see	instructi	ions)			
Type of property	(a) Date of transfer	(b) Description of property	dat	(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer	
10 Was cash the only pro	ainder of Part III and	go to Part IV.				X Yes No	
Type of property	(a) Date of	(b) Description of	Fair m	(c) narket value on	(d) Cost or other	(e) Gain recognized on	
Stock and securities	transfer	property	dat	e of transfer	basis	transfer	
Inventory							
Other property (not listed under another category)							
Property with built-in loss							
Totals							
11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 12 a 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. b 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. c 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. d Enter the transferred loss amount included in gross income as required under section 91 S Did the transferor transfer property described in section 367(d)(4)? If "No," skip Section C and questions 14a through 15.							
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri		(f) Income inclusion for year of transfer	
Property described in sec. 367(d)(4)							
Totals					<u> </u> 		

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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) 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 Yes	No No No
Sup	pplemental Part III Information Required To Be Reported (see instructions)			
	nsideration received consisted of interest in CL V Ventu	ces	Offshor	e AIV
LL	C.			
Pa	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 0.326% (b) After 0.326%			
17	Type of nonrecognition transaction (see instructions) ▶ 351			
18	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	Gain recognition under section 904(f)(3)		Yes	X No
b	Gain recognition under section 904(f)(5)(F)		Yes	X No
С			Yes	X No
d	Exchange gain under section 987		Yes	X No
19	Did this transfer result from a change in entity classification?		Yes	X No
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)	▶	· \$	
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			

Yes

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

Part I U.S. Transferor Information (see instructions)					
Name of transferor New Hampshire Charitable Foundation	Identifying number (see instructions)				
New namponite charteable roundation		02-600562			
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	X No	
b Did the transferor remain in existence after the transfer?		X	r es	☐ No	
If not, list the controlling shareholder(s) and their identifying number(s).					
Controlling shareholder		Identifying nu	mber		
				[]	
c If the transferor was a member of an affiliated group filing a consolidated return, was it the pare If not, list the name and employer identification number (EIN) of the parent corporation.	nt corporation?	·\	Yes	X No	
Name of parent corporation	EIN	of parent cor	poratio	on	
N/A					
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	section 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership		EIN of partner	 rship		
Castlelake V, LP	82-122	1295			
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		X	res	No No	
c Is the partner disposing of its entire interest in the partnership?		\	Yes	X No	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an esta	blished				
securities market?		<u> </u>	Yes	X No	
Part II Transferee Foreign Corporation Information (see instructions)					
4 Name of transferee (foreign corporation)	5	a Identifying	numbe	er, if any	
CL V Investment Solutions TE (Offshore) LLC					
6 Address (including country)	5	b Reference I	D numb	per	
Mitchell House, P.O. Box 174					
The Valley, B.W.I Anguilla		U-15			
 Country code of country of incorporation or organization AV 					
8 Foreign law characterization (see instructions) Corporation					
9 Is the transferee foreign corporation a controlled foreign corporation?		X\	 Yes	□ No	
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.				ev. 11-2018	

	Regarding Tran	sfer of Property (see i	instructi	ions)		
Section A - Cash			_			
Type of	(a) Date of	(b) Description of	Fair m	(c) narket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property	dat	e of transfer	basis	transfer
Cash	12/28/2018		1,	678,160.		
10 Was cash the only pro	ainder of Part III and g					X Yes No
Section B - Other Pro			subjec			()
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
,						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
Totals						
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 transferee foreign corporation of the transferee foreign corporation of the transferee foreign corporation of the transferred limit of the transferor tr	foreign branch (included) domestic corporation at is a foreign disregate transfer, was the domporation? ne 12d. If "No," skip liter and the control of the	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transfer	branch	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(d)			1	_
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer
			+			
			_			
			+			
Property described			-			
in sec. 367(d)(4)			+	-	1	+
			+		1	
			+		1	
	 		+	1	1	+
					 	+
Totals				1	F	_ <u> </u> form 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) 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	No No No
Sup	plemental Part III Information Required To Be Reported (see instructions)		
	nsideration received consisted of interest in CL V Invest	tment Solut	ions
$\overline{ ext{TE}}$	(Offshore) LLC.		
Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)		
1 0	je za sa		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.656% (b) After 0.656%		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	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?	Yes	X No
20 a	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)	▶\$_	
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		

Yes

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

Part I U.S. Transferor Information (see instructions)						
Name of transferor	ntifying number (see instructions)					
New Hampshire Charitable Foundation						
		02-	6005			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation	oration?	L	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 36	8(c)) by					
five or fewer domestic corporations?			Yes	X	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	tifying number			
			_			
c If the transferor was a member of an affiliated group filing a consolidated return, was it the paren	t corporation?	' ∟	Yes	X	No	
If not, list the name and employer identification number (EIN) of the parent corporation.						
Name of parent corporation	EIN	of parent of	orporati	ion		
N/A						
d Have basis adjustments under section 367(a)(4) been made?			Yes	Х	No	
(a)(i) 2001 asjaninina anao 20010 asia						
3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as	s such under s	section 367)				
complete questions 3a through 3d.		,	,			
a List the name and EIN of the transferor's partnership.						
<u> </u>						
Name of partnership		EIN of part	nership			
Davidson Kempner Institutional Partners, LP	13-359	7020				
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?		L	Yes		No	
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an estab	lished		_		_	
securities market?		<u></u>	Yes		No	
Part II Transferee Foreign Corporation Information (see instructions)						
4 Name of transferee (foreign corporation)	5	5a Identifyi	ng numb	er , if a	any	
DUID (G) IND II						
DKIP (Cayman) LTD II						
6 Address (including country)	5	5b Reference	e ID num	ber		
190 Elgin Avenue		TT 26				
George Town, Grand Cayman KY1-9005 Cayman Islands		U-26				
 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?		L	Yes	X	No	
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.		Fo	rm 926 (l	Rev. 1	1-2018)	

	Regarding Tran	sfer of Property (see i	nstructi	ions)		
Section A - Cash		4.			(D	
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2018	1 1 7		780,059.		
10 Was cash the only pro-	ainder of Part III and (X Yes No
Section B - Other Pro	pperty (otner tha		subjec	(c)	(d)	(e)
Type of property	Date of transfer	(b) Description of property		narket value on e 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						
Totals						
recognition agreement 12 a Were any assets of a foreign corporation? If "Yes," go to line 12b b Was the transferor a d (including a branch the If "Yes," continue to lin c Immediately after the foreign corp If "Yes," continue to lin d Enter the transferred line	t was filed? foreign branch (include) foreign branch (include) foreign dranch (include) foreign disregation at is a foreign disregation foreign branch (include) foreign disregation forei	that transferred substantiall arded entity) to a specified 1 lines 12c and 12d, and go to nestic corporation a U.S. shalline 12d, and go to line 13. In gross income as required and in section 367(d)(4)?	y all of the 0%-owned o line 13. areholder	rded entity) trans e assets of a forei d foreign corpora with respect to th	gn branch tion?	Yes No Yes No Yes No Yes No Yes No
Section 0 - intangible		ect to section sor(a)	\top			T
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of trans		(f) Income inclusion for year of transfer
			+			+
			+			
Property described						
in sec. 367(d)(4)						
			+			
			+			
						
Totals					F	

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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 No
Sup	pplemental Part III Information Required To Be Reported (see instructions)		
	nsideration received consisted of interest in DKIP (Cayma	an) Ltd. II.	,
_			
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 0.271% (b) After 0.270%		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	······· — ,	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
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)	> \$	
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 demostic corporation make a coation 255 distribution of stock in a foreign controlled corporation		

Yes

Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

Part I U.S. Transferor Information (see instructions)					
Name of transferor		Identifyir	ig numb	er (see instructions)	
New Hampshire Charitable Foundation		02-6005625			
1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation that is not a controlled foreign corporation.	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 36				v	
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	I	dentifying n	umber		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the paren If not, list the name and employer identification number (EIN) of the parent corporation.	t corporation?		Yes	X No	
Name of parent corporation	EIN	of parent co	orporati	on	
N/A					
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 a	s such under s	ection 367),			
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership		EIN of partn	ershin		
rame of partitioning	'	Ent of partif	oi oiiip		
CA Resources Fund, LP - Series Bain Europe III	26-196	2451			
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	X No	
d 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 estab			162	_2 <u>1</u> NO	
			V	X No	
Part II Transferee Foreign Corporation Information (see instructions)		<u></u>	Yes	X No	
4 Name of transferee (foreign corporation)	F.	a Identifyin	n numh	or if any	
Name of transferee (ideign corporation)	3	a lu c illiyiii	y mumb	ei, ii ariy	
Evergood 2 APS		9813905	38		
6 Address (including country)	51	b Reference	ID num	ber	
Sundkrogsgade 5 2100					
Copenhagen, Denmark Denmark	1	J-7			
 Country code of country of incorporation or organization 					
8 Foreign law characterization (see instructions) Corporation					
9 Is the transferee foreign corporation a controlled foreign corporation?			Yes	X No	
824531 12-04-18 LHA For Paperwork Reduction Act Notice, see separate instructions.		Fori		Rev. 11-2018)	

	Regarding Trans	sfer of Property (see i	nstructi	ions)		
Section A - Cash						
Type of	(a) Date of	(b) Description of	Fair m	(c) narket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property	dat	e of transfer	basis	transfer
Cash	01/25/2018			152,726.		
10 Was cash the only pro	ainder of Part III and g					X Yes No
Section B - Other Pro			subjec			()
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
,						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
			_			
Totals						
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 transferee foreign corporation of the transferee foreign corporation of the transferee foreign corporation of the transferred limit of the transferor tr	foreign branch (included) domestic corporation at is a foreign disregate transfer, was the domporation? ne 12d. If "No," skip liter and the composition of the comp	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transfer e assets of a foreign d foreign corporatio with respect to the	branch	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(a)			1	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer
			\perp			
Duan autor ala a avila a al						+
Property described						+
in sec. 367(d)(4)			+			+
	-		+			
			+	1		+
			+	1		1
 Totals						1
Ιοιαίδ					F	

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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 Yes	No No No
	olemental Bart III Information Barrierd Ta Ba Barrantad (i I)		
	plemental Part III Information Required To Be Reported (see instructions)	A D C	
C01	nsideration received consisted of interest in Evergood 2	APS.	
Pa	rt 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 0.000% (b) After 0.000% Type of nonrecognition transaction (see instructions) $\triangleright 351$		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
	Gain recognition under section 904(f)(3)	Yes	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	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)	> \$	
	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			

Yes

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

Return by a U.S. Transferor of Property

to a Foreign Corporation

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

OMB No. 1545-0026

Internal Re	venue Service	Attach to your income tax return for the year of the transfer or distr	ibution.	Sequence	No. 128
Part I	U.S. Tra	nsferor Information (see instructions)		-	
	f transferor			Identifying number	er (see instructions)
New	Hampsh:	ire Charitable Foundation			
			02-60056	525	
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 v	was a corporation, complete questions 2a through 2d.			
a If	the transfer wa	s a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c))	by		
fiv	e or fewer don	nestic corporations?		Yes	X No
b Di	id the transfero	r remain in existence after the transfer?		X Yes	☐ No
		ntrolling shareholder(s) and their identifying number(s).			
		Controlling shareholder	Iden	tifying number	
					77
		was a member of an affiliated group filing a consolidated return, was it the parent corp	ooration?	L Yes	X No
If	not, list the nar	ne and employer identification number (EIN) of the parent corporation.			
		Name of parent corporation	EIN of p	parent corporati	on
N/A					
		stments under section 367(a)(4) been made?		Yes	X No
u iii	ave basis aujus	initialis diluei section 307 (a)(4) been made:		L 1es	NO
3 If	the transferor	was a partner in a partnership that was the actual transferor (but is not treated as suc	h under secti	on 367)	
		ons 3a through 3d.	ir drider section	511 507),	
		d EIN of the transferor's partnership.			
	st trie riarrie ari	u Lint of the transferor 3 partnership.			
		Name of partnership	EIN	of partnership	
Oak	tree Op	portunities Fund XB Holdings (Cayman),			
LP.			3-14126	48	
		ick up its pro rata share of gain on the transfer of partnership assets?		F== 1	□ No
		posing of its entire interest in the partnership?		··· 🖂 🕶	X No
	•	posing of an interest in a limited partnership that is regularly traded on an established		—	
	ecurities marke			Yes	X No
Part I		ree Foreign Corporation Information (see instructions)			
4 N	ame of transfer	ee (foreign corporation)	5a Id	dentifying numb	er , if any
				, ,	
Oak	tree Op	os XB Holdco LTD	98:	1413683	
6 Ad	ddress (includir	ng country)	5b R	eference ID num	ber
	ospital				
Geor	ge Town	, Grand Cayman KY1-9008 Cayman Islands	U-4	46.1	
7 C	ountry code of	country of incorporation or organization	•		
CJ	- 	· · · · · · · · · · · · · · · · · · ·			
8 Fo	oreign law char	acterization (see instructions)			
	poration				
9 Is	the transferee	foreign corporation a controlled foreign corporation?		Yes	X No
		For Paperwork Reduction Act Notice, see separate instructions.		Form 926 (F	Rev. 11-2018)

	Regarding Tran	sfer of Property (see i	instructi	ions)		
Section A - Cash			_			
Type of	(a) Date of	(b) Description of	Fair m	(c) narket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property		e of transfer	basis	transfer
Cash	12/31/2018			224,871.		
10 Was cash the only pro	ainder of Part III and g					X Yes No
Section B - Other Pro			subjec			()
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
,						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
Totals						
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 transferee foreign corporation of the transferee foreign corporation of the transferee foreign corporation of the transferred limit of the transferor tr	foreign branch (included) domestic corporation at is a foreign disregate transfer, was the domporation? ne 12d. If "No," skip liter and the control of the	that transferred substantiall urded entity) to a specified 1 ines 12c and 12d, and go to nestic corporation a U.S. shadine 12d, and go to line 13. in gross income as required ed in section 367(d)(4)?	y all of the 0%-owne o line 13. areholder	rded entity) transferments	n branch	Yes No Yes No Yes No Yes No
Section C - Intangible	e Property Subje	ect to Section 367(a)	_			1
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer
			+	1		
Dona a substanta a substant			+			
Property described						
in sec. 367(d)(4)			+			
			+	1		
Totals						
Totals				I	F	 Form 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 Yes	No No No
	plemental Part III Information Required To Be Reported (see instructions)		
Cor	nsideration received consisted of interest in Oaktree Opp	os XB Holdco	o LTD.
Dai	rt IV Additional Information Regarding Transfer of Property (see instructions)		
Fai	Additional information negatiting transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.000% (b) After 0.058%		
17	Type of nonrecognition transaction (see instructions) ▶ 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)		X No
С			X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?		X No
2 0 a	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)	> \$	
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 demostic corporation make a section 255 distribution of stock in a foreign controlled corporation		

Yes