**Form 990-T**

**Department of the Treasury**
**Internal Revenue Service**

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

**Print**

**MINNESOTA COMMUNITY FOUNDATION**

**Type**

101 FIFTH STREET EAST, SUITE 2400

**City or town, state or province, country, and ZIP or foreign postal code**

**SAINT PAUL** M**N** 55101

**E**

41-0832480

**Unrelated business activity code**

(See instructions.)

**D**

Employer identification number

(Employees' trust, see instructions.)

**F**

Group exemption number (See instructions.)

**H**

Enter the number of the organization's unrelated trades or businesses. If only one, complete Parts I–V. If more than one, describe the first in the blank space at the end of the previous sentence, complete Parts I and II, complete a Schedule M for each additional trade or business, then complete Parts III–V.

**I**

During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? 

Yes

No

**J**

The books are in care of SCOTT ZASTOUPIL

**Telephone number** 651-224-5463

**Part I**

**Unrelated Trade or Business Income**

<table>
<thead>
<tr>
<th>(A) Income</th>
<th>(B) Expenses</th>
<th>(C) Net</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a. Gross receipts or sales</td>
<td>1c</td>
<td>u</td>
</tr>
<tr>
<td>1b. Less returns and allowances</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Cost of goods sold (Schedule A, line 7)</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>3. Gross profit. Subtract line 2 from line 1c</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>4a. Capital gain net income (attach Schedule D)</td>
<td>4a</td>
<td></td>
</tr>
<tr>
<td>4b. Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797)</td>
<td>4b</td>
<td></td>
</tr>
<tr>
<td>4c. Capital loss deduction for trusts</td>
<td>4c</td>
<td></td>
</tr>
<tr>
<td>5. Income (loss) from partnership and S corporation (attach statement)</td>
<td>5</td>
<td></td>
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<tr>
<td>SEE STMT 1</td>
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<td></td>
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<tr>
<td>6. Rent income (Schedule C)</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>7. Unrelated debt-financed income (Schedule E)</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>8. Interest, annuities, royalties, and rents from controlled organization (Schedule F)</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>9. Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>10. Exploited exempt activity income (Schedule I)</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>11. Advertising income (Schedule J)</td>
<td>11</td>
<td></td>
</tr>
<tr>
<td>12. Other income (See instructions; attach schedule)</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>13. Total. Combine lines 3 through 12</td>
<td>13</td>
<td></td>
</tr>
</tbody>
</table>

**Part II**

**Deductions Not Taken Elsewhere**
(See instructions for limitations on deductions.) (Deductions must be directly connected with the unrelated business income.)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>14. Compensation of officers, directors, and trustees (Schedule K)</td>
<td>14</td>
</tr>
<tr>
<td>15. Salaries and wages</td>
<td>15</td>
</tr>
<tr>
<td>16. Repairs and maintenance</td>
<td>16</td>
</tr>
<tr>
<td>17. Bad debts</td>
<td>17</td>
</tr>
<tr>
<td>18. Interest (attach schedule) (see instructions)</td>
<td>18</td>
</tr>
<tr>
<td>19. Taxes and licenses</td>
<td>19</td>
</tr>
<tr>
<td>20. Depreciation (attach Form 4562)</td>
<td>20</td>
</tr>
<tr>
<td>21. Less depreciation claimed on Schedule A and elsewhere on return</td>
<td>21a</td>
</tr>
<tr>
<td>22. Depletion</td>
<td>22</td>
</tr>
<tr>
<td>23. Contributions to deferred compensation plans</td>
<td>23</td>
</tr>
<tr>
<td>24. Employee benefit programs</td>
<td>24</td>
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<tr>
<td>25. Excess exempt expenses (Schedule I)</td>
<td>25</td>
</tr>
<tr>
<td>26. Excess readership costs (Schedule J)</td>
<td>26</td>
</tr>
<tr>
<td>27. Other deductions (attach schedule)</td>
<td>SEE STATEMENT 2</td>
</tr>
<tr>
<td>28. Total deductions. Add lines 14 through 27</td>
<td>28</td>
</tr>
<tr>
<td>29. Unrelated business taxable income before net operating loss deduction. Subtract line 28 from line 13</td>
<td>29</td>
</tr>
<tr>
<td>30. Deduction for net operating loss arising in tax years beginning on or after January 1, 2018 (see instructions)</td>
<td>30</td>
</tr>
<tr>
<td>31. Unrelated business taxable income. Subtract line 30 from line 29</td>
<td>31</td>
</tr>
</tbody>
</table>

**DAA**

For Paperwork Reduction Act Notice, see instructions.
Part III  Total Unrelated Business Taxable income

32  Total of unrelated business taxable income computed from all unrelated trades or businesses (see instructions) .................................................. 32  -342,089
33  Amounts paid for disallowed fringes .................................................................................................................................................. 33
34  Charitable contributions (see instructions for limitation rules) ............................................................................................................. 34
35  Total unrelated business taxable income before pre-2018 NOLs and specific deductions. Subtract line 34 from the sum of lines 32 and 33 .................................................................................................................. 35  -342,089
36  Deductions for net operating loss arising in tax years beginning before January 1, 2018 (see instructions) ................................................................................................................................. 36
37  Total of unrelated business taxable income before specific deduction. Subtract line 36 from line 35 ...................................................... 37  -342,089
38  Specific deduction (Generally $1,000, but see line 38 instructions for exceptions) .................................................................................................................. 38  1,000
39  Unrelated business taxable income. Subtract line 38 from line 37. If line 38 is greater than line 37, enter the smaller of zero or line 37 ........................................................................................................... 39  -342,089

Part IV  Tax Computation

40  Organizations Taxable as Corporations. Multiply line 39 by 21% (0.21) ....................................................................................................................... 40
41  Trusts Taxable at Trust Rates. See instructions for tax computation. Income tax on the amount on line 39 from:  Tax rate schedule or  Schedule D (Form 1041) ........................................................................................................................................... 41
42  Proxy tax. See instructions  .......................................................................................................................................................................................... 42
43  Alternative minimum tax (trusts only) ................................................................................................................................................................. 43
44  Tax on Noncompliant Facility Income. See instructions ........................................................................................................................................ 44
45  Total. Add lines 42, 43, and 44 to line 40 or 41, whichever applies ................................................................................................................................. 45  0

Part V  Tax and Payments

46a  Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116) ................................................................................................................... 46a
b  Other credits (see instructions) .................................................................................................................................................................................. 46b
c  General business credit. Attach Form 3800 (see instructions) ................................................................................................................................. 46c
d  Credit for prior year minimum tax (attach Form 8801 or 8827) ......................................................................................................................................... 46d
e  Total credits. Add lines 46a through 46d ......................................................................................................................................................... 46e
47  Subtract line 46e from line 45 ............................................................................................................................................................................. 47
48  Other taxes. Check if from:  Form 4255  Form 8611  Form 8866  Other (attach sch) ......................................................................................................................................................... 48
49  Total tax. Add lines 47 and 48 (see instructions) ...................................................................................................................................................... 49  0
50  2019 net 965 tax liability paid from Form 965-A or Form 965-B, Part I, column (k) line 3 ................................................................................................. 50

51a  Payments: A 2018 overpayment credited to 2019 ................................................................................................................................. 51a  1,229
b  2019 estimated tax payments ............................................................................................................................................................................. 51b
c  Tax deposited with Form 8868 .................................................................................................................................................................................. 51c
d  Foreign organizations: Tax paid or withheld at source (see instructions) ................................................................................................. 51d
e  Backup withholding (see instructions) ................................................................................................................................................................. 51e
f  Credit for small employer health insurance premiums (attach Form 8941) ........................................................................................................ 51f
g  Other credits, adjustments, and payments:  Form 2439  Form 4136  Other  Total  ........................................................................................................................................................................ 51g
52  Total payments. Add lines 51a through 51g ......................................................................................................................................................... 52  1,229
53  Estimated tax penalty (see instructions). Check if Form 2220 is attached .............................................................................................................. 53
54  Tax due. If line 52 is less than the total of lines 49, 50, and 53, enter amount owed ................................................................................... 54
55  Overpayment. If line 52 is larger than the total of lines 49, 50, and 53, enter amount overpaid ................................................................................. 55  1,229
56  Enter the amount of line 55 you want:  Credited to 2020 estimated tax  Refunded ................................................................................................. 56

Part VI  Statements Regarding Certain Activities and Other Information (see instructions)

57  At any time during the 2019 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If "YES," the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If "YES," enter the name of the foreign country here 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Schedule A – Cost of Goods Sold

1. Description of property

   (1) N/A

2. Rent received or accrued

   (a) From personal property (if the percentage of rent
       for personal property is more than 10% but not
       more than 50%)

   (b) From real and personal property (if the
       percentage of rent for personal property exceeds
       50% or if the rent is based on profit or income)

3. (a) Deductions directly connected with the income
     in columns 2(a) and 2(b) (attach schedule)

4. (a) Straight line depreciation
     (attach schedule)

5. (b) Other deductions
     (attach schedule)

6. Gross income from or debt-financed property

7. Cost of goods sold. Subtract
    line 6 from line 5. Enter here and
    in Part I, line 2

8. Do the rules of section 263A (with respect to
    property produced or acquired for resale) apply
    to the organization?

Yes No

Schedule C – Rent Income (From Real Property and Personal Property Leased With Real Property)

(see instructions)

1. Description of property

   (1) N/A

2. Gross income from or

3. (a) Deductions directly connected with the income
     in columns 2(a) and 2(b) (attach schedule)

4. Amount of average

5. Average adjusted basis

6. Column 4 divided

7. Gross income reportable
    (column 2 x column 6)

8. Allocable deductions
    (column 6 x total of columns
    3(a) and 3(b))

Enter here and on page 1. Enter here and on page 1.
Part I, line 7, column (A). Part I, line 7, column (B).

Schedule E – Unrelated Debt-Financed Income

(see instructions)

1. Description of debt-financed property

   (1) N/A

2. Gross income from or

3. (a) Straight line depreciation
     (attach schedule)

4. (b) Other deductions
     (attach schedule)

5. Average adjusted basis
     (attach 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))

Enter here and on page 1. Enter here and on page 1.
Part I, line 7, column (A). Part I, line 7, column (B).

Total dividends-received deductions included in column 8

Form 990-T (2019)
### Schedule G – Investment Income of a Section 501(c)(7), (9), or (17) Organization
(see instructions)

<table>
<thead>
<tr>
<th>1. Description of income</th>
<th>2. Amount of income</th>
<th>3. Deductions directly connected with income (loss) (see instructions)</th>
<th>4. Set-asides and set-asides (attach schedule)</th>
<th>5. Part of column 4 that is included in the controlling organization’s gross income</th>
<th>6. Deductions directly connected with income in column 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) N/A</td>
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<tr>
<td>(2)</td>
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<td>(4)</td>
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</tbody>
</table>

### Nonexempt Controlled Organizations

<table>
<thead>
<tr>
<th>7. Taxable Income</th>
<th>8. Net unrelated income (loss) (see instructions)</th>
<th>9. Total of specified payments made</th>
<th>10. Part of column 9 that is included in the controlling organization’s gross income</th>
<th>11. Deductions directly connected with income in column 10</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1)</td>
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<td>(4)</td>
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</tbody>
</table>

**Totals**

Add columns 5 and 10. Enter here and on page 1, Part I, line 9, column (A).

Add columns 6 and 11. Enter here and on page 1, Part I, line 8, column (B).

### Schedule I – Exploited Exempt Activity Income, Other Than Advertising Income
(see instructions)

<table>
<thead>
<tr>
<th>1. Description of exploited activity</th>
<th>2. Gross unrelated business income from trade or business</th>
<th>3. Expenses directly connected with production of unrelated business income</th>
<th>4. Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7.</th>
<th>5. Gross income from activity that is not unrelated business income</th>
<th>6. Expenses attributable to column 5</th>
<th>7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) N/A</td>
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</tbody>
</table>

**Totals**

Enter here and on page 1, Part I, line 10, col. (A).

Enter here and on page 1, Part I, line 10, col. (B).

### Schedule J – Advertising Income
(see instructions)

**Part I Income From Periodicals Reported on a Consolidated Basis**

<table>
<thead>
<tr>
<th></th>
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</tbody>
</table>

**Totals (carry to Part II, line (5))**
### 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.)

<table>
<thead>
<tr>
<th></th>
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<tbody>
<tr>
<td>(1) N/A</td>
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<tr>
<td>Totals from Part I</td>
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</tbody>
</table>

Enter here and on page 1, Part I, line 11, col. (A).

Enter here and on page 1, Part I, line 11, col. (B).

Enter here and on page 1, Part II, line 26.

### Totals, Part II (lines 1-5) U

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

<table>
<thead>
<tr>
<th>1. Name</th>
<th>2. Title</th>
<th>3. Percent of time devoted to business</th>
<th>4. Compensation attributable to unrelated business</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) N/A</td>
<td></td>
<td>%</td>
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<tr>
<td>(2)</td>
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<td>(3)</td>
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<td>%</td>
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<tr>
<td>(4)</td>
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<td>%</td>
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</tbody>
</table>

Total. Enter here and on page 1, Part II, line 14  U
Election to Relinquish Net Operating Loss Carry Back Period

Minnesota Community Foundation
EIN 41-0832480
Form 990-T
Tax Year Ending December 31, 2019

The above mentioned taxpayer incurred a net operating loss in its tax year ended December 31, 2019, and is entitled to a carry back period of five years. The Foundation is electing to apply § 172(b)(3) under Rev. Proc. 2020-24 for 2019.

In accordance with Section 172(b)(3) of the Internal Revenue Code, taxpayer hereby elects to relinquish the entire carry back period with respect to the current net operating loss incurred in its tax year 2019.
### Statement 1 - Form 990-T, Part I, Line 5 - Income (Loss) from Partnerships or S-Corps

<table>
<thead>
<tr>
<th>Name of Partnership or S-Corp</th>
<th>Gross Income</th>
<th>Direct Deductions (Part. only)</th>
<th>Net Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMMUNITY INVESTMENT GROUP</td>
<td>$ -333,060</td>
<td>$</td>
<td>$ -333,060</td>
</tr>
<tr>
<td>TOTAL</td>
<td>$ -333,060</td>
<td>$ 0</td>
<td>$ -333,060</td>
</tr>
</tbody>
</table>

### Statement 2 - Form 990-T, Part II, Line 28 - Other Deductions

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROFESSIONAL FEES</td>
<td>$ 7,420</td>
</tr>
<tr>
<td>TOTAL</td>
<td>$ 7,420</td>
</tr>
</tbody>
</table>
**Part I U.S. Transferor Information**

**Name of transferor**

<table>
<thead>
<tr>
<th>MINNESOTA COMMUNITY FOUNDATION</th>
<th>41-0832480</th>
</tr>
</thead>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [x] No
2. If the transferee is 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? [ ] Yes [x] No
   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3. 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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

4. d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [x] No

**Part II Transferee Foreign Corporation Information**

**Name of transferee (foreign corporation)**

<table>
<thead>
<tr>
<th>HARBERT EUROPEAN REAL ESTATE FUND V</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>Country code of country of incorporation or organization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2100 THIRD AVENUE NORTH, SUITE 600 ALABAMA</td>
<td>UK</td>
</tr>
<tr>
<td>BIRMINGHAM 35203</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Foreign law characterization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>LIMITED PARTNERSHIP</td>
</tr>
</tbody>
</table>

5. Is the transferee foreign corporation a controlled foreign corporation? [x] Yes [ ] No
### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td><strong>395,225</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   ✗ Yes ☐ No  

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   ☐ Yes ✗ No  

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   ☐ Yes ✗ No  

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?  
   ☐ Yes ✗ No  

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?  
   ☐ Yes ✗ No  

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 911 u. $  
   ☐ Yes ✗ No  

13 Did the transferor transfer property described in section 367(d)(4)?  
   ☐ Yes ✗ No  

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm's length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

c 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?  

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)?

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. 

(a) Before %  (b) After %

17 Type of nonrecognition transaction (see instructions)  

18 Indicate whether any transfer reported in Part III is subject to any of the following.  

a Gain recognition under section 904(f)(3)  

b Gain recognition under section 904(f)(5)(F)  

c Recapture under section 1503(d)  

d Exchange gain under section 987  

19 Did this transfer result from a change in entity classification?  

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  

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

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  

Yes No
**Part I  U.S. Transferor Information** (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MINNESOTA COMMUNITY FOUNDATION</td>
<td>41–0832480</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes  
   - **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  
     - 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
   - Yes  
   - No

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made?  
   - Yes  
   - No

3. If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   - a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE COMMUNITY INVESTMENT GROUP</td>
<td>41–1765364</td>
</tr>
</tbody>
</table>

   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 established securities market?  
   - Yes  
   - No

**Part II  Transferee Foreign Corporation Information** (see instructions)

4. Name of transferee (foreign corporation)  
   - AJ LUCAS GROUP LIMITED

5a. Identifying number, if any
   -  

5b. Reference ID number (see instructions)
   - AJLUCAS

6. Address (including country)  
   - 1 ELIZABETH PLAZA  
     - NORTH SYDNEY  
     - AS NWS 2060  
     - AUSTRALIA

7. Country code of country of incorporation or organization (see instructions)
   - AS

8. Foreign law characterization (see instructions)  
   - CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - Yes  
   - **No**
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>11/18/19 DEBT PRINCIPAL &amp; INT</td>
<td>371</td>
<td>371</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals  

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  

12a 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.  

12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  
If “Yes,” go to line 12c. If “No,” skip lines 12c and 12d, and go to line 13.  

12c 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.  

12d Enter the transferred loss amount included in gross income as required under section 91 u S  

13 Did the transferor transfer property described in section 367(d)(4)?  
If “No,” skip Section C and questions 14a through 15.  

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

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Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
   Yes [ ] No [ ]

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
   Yes [ ] No [ ]

c 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) u $ ______.

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 [ ]

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before ________ %  (b) After ________ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3)  
      Yes [ ] No [ ]
   b Gain recognition under section 904(f)(5)(F)  
      Yes [ ] No [ ]
   c Recapture under section 1503(d)  
      Yes [ ] No [ ]
   d Exchange gain under section 987  
      Yes [ ] No [ ]

19 Did this transfer result from a change in entity classification?  
   Yes [ ] No [ ]

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If “Yes,” complete lines 20b and 20c.
      Yes [ ] No [ ]

   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ ________.
      Yes [ ] No [ ]

   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
      Yes [ ] No [ ]

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
   Yes [ ] No [ ]
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MINNESOTA COMMUNITY FOUNDATION</td>
<td>41-0832480</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☑ 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? ☑ No
   b. Did the transferor remain in existence after the transfer? ☑ No

   If not, list the controlling shareholder(s) and their identifying number(s).

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<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☑ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

   d. Have basis adjustments under section 367(a)(4) been made? ☑ 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.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE COMMUNITY INVESTMENT GROUP</td>
<td>41-1765364</td>
</tr>
</tbody>
</table>

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? ☑ No
   c. Is the partner disposing of its entire interest in the partnership? ☑ No
   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? ☑ No

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)
   ANOKION SA

5a. Identifying number, if any
   ☑ No

5b. Reference ID number (see instructions)
   ANOKION

6. Address (including country)
   EN RUCHOZ, CH. DE LA DENT D’OCHE 1A
   ECUBLENS SZ CH-1024 SWITZERLAND

7. Country code of country of incorporation or organization (see instructions)
   SZ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? ☑ Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>07/11/19</td>
<td></td>
<td></td>
<td></td>
<td>76</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  [ ] Yes  [ ] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>06/06/19</td>
<td>COMMON &amp; PREFERRED STOCK</td>
<td>110</td>
<td>110</td>
<td></td>
</tr>
</tbody>
</table>

Inventory

Other property (not listed under another category)

Property with built-in loss

Totals  110  110

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  [ ] Yes  [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  [ ] Yes  [ ] No

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?  [ ] Yes  [ ] No

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?  [ ] Yes  [ ] No

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 u $  [ ] Yes  [ ] No

13 Did the transferor transfer property described in section 367(d)(4)?  [ ] Yes  [ ] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
Part IV  Additional Information Regarding Transfer of Property (see instructions)

16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
    (a) Before __________ %  (b) After __________ %

17  Type of nonrecognition transaction (see instructions)  u  IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following.
    a  Gain recognition under section 904(f)(3)  u  Yes  X  No
    b  Gain recognition under section 904(f)(5)(F)  u  Yes  X  No
    c  Recapture under section 1503(d)  u  Yes  X  No
    d  Exchange gain under section 987  u  Yes  X  No

19  Did this transfer result from a change in entity classification?  u  Yes  X  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
    If “Yes,” complete lines 20b and 20c.
    b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ ________
    c  Did the domestic corporation not recognize gain or loss on the distribution of property because the
       property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  u  Yes  X  No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
    covered by section 367(e)(1)? See instructions  u  Yes  X  No
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I U.S. Transferor Information (see instructions)

Name of transferor: MINNESOTA COMMUNITY FOUNDATION
Identifying number: 41-0832480

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [ ] 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 [ ] 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: [ ] Yes [ ] No
      Identifying number: [ ] Yes [ ] No

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No
      If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation: [ ] Yes [ ] No
      EIN of parent corporation: [ ] Yes [ ] No

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] No

3. If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a. List the name and EIN of the transferor’s partnership.

   Name of partnership: [ ] Yes [ ] No
      EIN of partnership: [ ] Yes [ ] No

Part II Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)
   BCPE BREEZE CAYMAN ATSUMI, LLC

5a. Identifying number, if any

6. Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN CAYMAN ISLANDS

5b. Reference ID number (see instructions)
   BCPEATSUMI

7. Country code of country of incorporation or organization (see instructions)
   CJ

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [ ] No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

If "Yes," skip the remainder of Part III and go to Part IV.

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

12a **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 u $**

13 **Did the transferor transfer property described in section 367(d)(4)?**

If "No," skip Section C and questions 14a through 15.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>26</td>
<td>26</td>
<td></td>
</tr>
</tbody>
</table>

Other property
(not listed under another category)

| Property with built-in loss |                      |                            |                                          |                        |                               |
| Totals                       |                      |                            |                                          |                        |                               |
|                              | 26                   | 26                         |                                          |                        |                               |

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? [ ] Yes [ ] No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? [ ] Yes [ ] No

c 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

---

**Supplemental Part III Information Required To Be Reported** (see instructions)

---

**Part IV Additional Information Regarding Transfer of Property** (see instructions)

16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.

(a) Before % (b) After %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

a Gain recognition under section 904(f)(3) [ ] Yes [ ] No

b Gain recognition under section 904(f)(5)(F) [ ] Yes [ ] No

c Recapture under section 1503(d) [ ] Yes [ ] No

d Exchange gain under section 987 [ ] Yes [ ] No

19 Did this transfer result from a change in entity classification? [ ] Yes [ ] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions [ ] Yes [ ] No

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

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ 

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? [ ] Yes [ ] No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions [ ] Yes [ ] No

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Form 926 (Rev. 11-2018)
Return by a U.S. Transferor of Property to a Foreign Corporation

Form 926

(Rev. November 2018)

Department of the Treasury
Internal Revenue Service

Attachment
Sequence No. 128

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

41–0832480

Identifying number (see instructions)

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  ☐ Yes  ☑ 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  ☑ No

b  Did the transferor remain in existence after the transfer?  ☐ Yes  ☑ No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number


c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  ☐ Yes  ☑ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


d  Have basis adjustments under section 367(a)(4) been made?  ☐ Yes  ☑ No

3  If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a  List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

THE COMMUNITY INVESTMENT GROUP

41–1765364

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 established securities market?  ☐ Yes  ☑ No

Part II  Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN CHITOSE, LLC

Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN  CJ  KY1–1104  CAYMAN ISLANDS

Country code of country of incorporation or organization (see instructions)

CJ

Foreign law characterization (see instructions)

CORPORATION

Identifying number, if any

5a

Reference ID number (see instructions)

5b

BCPECHITOSE

Is the transferee foreign corporation a controlled foreign corporation?  ☐ Yes  ☑ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
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<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  
Yes [X] No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
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</tr>
<tr>
<td>Other property (not listed under another category)</td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<td></td>
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</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>115</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes [X] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes [X] No

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?  
Yes [X] No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
Yes [X] No

d Enter the transferred loss amount included in gross income as required under section 91 u $ __________

13 Did the transferor transfer property described in section 367(d)(4)?  
Yes [X] No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  ☐ Yes   ☐ No

b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  ☐ Yes   ☐ No

c  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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV  Additional Information Regarding Transfer of Property (see instructions)

16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
(a) Before ________%  (b) After ________%  IRC SECTION 351

17  Type of nonrecognition transaction (see instructions)  ☐ IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following.
   a  Gain recognition under section 904(f)(3)  ☐ Yes   ☐ No
   b  Gain recognition under section 904(f)(5)(F)  ☐ Yes   ☐ No
   c  Recapture under section 1503(d)  ☐ Yes   ☐ No
   d  Exchange gain under section 987  ☐ Yes   ☐ No

19  Did this transfer result from a change in entity classification?  ☐ Yes   ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  See instructions
   If “Yes,” complete lines 20b and 20c.
   b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ ______________
   c  Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  ☐ Yes   ☐ No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)?  See instructions  ☐ Yes   ☐ No
### Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MINNESOTA COMMUNITY FOUNDATION</td>
<td>41–0832480</td>
</tr>
</tbody>
</table>

**1.** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [x] No

**2.** If the transferor was a corporation, complete questions 2a through 2d.

- **a.** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? [ ] Yes [x] No
- **b.** Did the transferor remain in existence after the transfer? [ ] Yes [x] No
  - If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
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</tr>
</tbody>
</table>

**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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**d.** Have basis adjustments under section 367(a)(4) been made? [ ] Yes [x] No

### Part II  Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>BCPE BREEZE CAYMAN HIRADOMINAMI, LL</td>
<td></td>
</tr>
</tbody>
</table>

**6.** Address (including country)

- **UGLAND HOUSE, SOUTH CHURCH STREET**
- **GEORGE TOWN, CJ KY1–1104 CAYMAN ISLANDS**

**7.** Country code of country of incorporation or organization (see instructions)

- **CJ**

**8.** Foreign law characterization (see instructions)

<table>
<thead>
<tr>
<th>CORPORATION</th>
</tr>
</thead>
</table>

**9.** Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
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<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If “Yes,” skip the remainder of Part III and go to Part IV.  
☐ Yes  ☒ No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
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<tbody>
<tr>
<td>Stock and securities</td>
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</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>70</td>
<td>70</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
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</tr>
<tr>
<td>Property with built-in loss</td>
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<td>Totals</td>
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<td>70</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes  ☒ No

12a 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.  
☐ Yes  ☒ No

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.  
☐ Yes  ☒ No

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.  
☐ Yes  ☒ No

d Enter the transferred loss amount included in gross income as required under section 911 $  
If “No,” skip Section C and questions 14a through 15.  
☐ Yes  ☒ No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
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<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
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<td>Totals</td>
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<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ................................................................. Yes ☐ No ☐

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ................................................................. Yes ☐ No ☐

c 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) u $ .................................................................

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _____ % (b) After _____ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) ................................................................. Yes ☐ No ☐
   b Gain recognition under section 904(f)(5)(F) ................................................................. Yes ☐ No ☐
   c Recapture under section 1503(d) ................................................................. Yes ☐ No ☐
   d Exchange gain under section 987 ................................................................. Yes ☐ No ☐

19 Did this transfer result from a change in entity classification? ................................................................. Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.
   If “Yes,” complete lines 20b and 20c.
   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ .................................................................
   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? ................................................................. Yes ☐ No ☐

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions. ................................................................. Yes ☐ No ☐
Part I  U.S. Transferor Information  (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION  
Identifying number (see instructions)  41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   Yes  No  X

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  No  X

   b Did the transferor remain in existence after the transfer?  
      Yes  No  X

      If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder  
Identifying number  

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
      Yes  No  X

      If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation  
EIN of parent corporation

   d Have basis adjustments under section 367(a)(4) been made?  
      Yes  No  X

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a List the name and EIN of the transferor's partnership.

Name of partnership  
EIN of partnership  41-1765364

   b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
      Yes  No  X

   c Is the partner disposing of its entire interest in the partnership?  
      Yes  No  X

   d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  
      Yes  No  X

Part II  Transferee Foreign Corporation Information  (see instructions)

4 Name of transferee (foreign corporation)  
   BCPE BREEZE CAYMAN HIRONO, LLC

5a Identifying number, if any

6 Address (including country)  
   UGLAND HOUSE, SOUTH CHURCH STREET  
   GEORGE TOWN  CJ KYI-1104 CAYMAN ISLANDS

5b Reference ID number  
   (see instructions)  BCPEHIRONO

7 Country code of country of incorporation or organization (see instructions)  
   CJ

8 Foreign law characterization (see instructions)  
   CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation?  
   Yes  No  X

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>126</td>
<td>126</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>126</td>
<td>126</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [x] No

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? [ ] Yes [x] No

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? [ ] Yes [x] No

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 u $ ____________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
### Part IV  Additional Information Regarding Transfer of Property (see instructions)

16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _____ %  (b) After _____ %

17  Type of nonrecognition transaction (see instructions)  
   IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following.
   a  Gain recognition under section 904(f)(3)  
   b  Gain recognition under section 904(f)(5)(F)  
   c  Recapture under section 1503(d)  
   d  Exchange gain under section 987

19  Did this transfer result from a change in entity classification?  
   Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  
   Yes  No
   If “Yes,” complete lines 20b and 20c.
   b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  
   c  Did the domestic corporation not recognize gain or loss on the distribution of property because the 
   property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
   Yes  No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation 
   covered by section 367(e)(1)?  
   Yes  No
Form 926
Department of the Treasury
Internal Revenue Service

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

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

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number

41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ......................................................... [ ] Yes [X] No

2 If the transferor was a corporation, complete questions 2a through 2d.

a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? ......................................................... [ ] Yes [ ] No

b Did the transferor remain in existence after the transfer? ................................................................................................................................. [ ] Yes [ ] No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

 Identifying number

Name of parent corporation

EIN of parent corporation

[ ] Yes [ ] No

C If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ......................................................... [ ] Yes [ ] No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

[ ] Yes [ ] No

d Have basis adjustments under section 367(a)(4) been made? ................................................................................................................................. [ ] Yes [ ] No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a List the name and EIN of the transferor's partnership.

Name of partnership

EIN of partnership

THE COMMUNITY INVESTMENT GROUP

41-1765364

b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? ................................................................................................................................. [ ] Yes [X] No

c Is the partner disposing of its entire interest in the partnership? ................................................................................................................................. [ ] Yes [X] No

d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? ................................................................................................................................. [ ] Yes [X] No

Part II Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN NOHEJI, LLC

Identifying number, if any

Identifying number

5a

5b Reference ID number

(see instructions)

UGLAND HOUSE, SOUTH CHURCH STREET

BCPENOHEJI

GEORGE TOWN CJ KY1-1104 CAYMAN ISLANDS

6 Address (including country)

Country code of country of incorporation or organization (see instructions)

CJ

7

Foreign law characterization (see instructions)

CORPORATION

[ ] Yes [X] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA

Form 926 (Rev. 11-2018)
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### 10. Was cash the only property transferred?

If "Yes," skip the remainder of Part III and go to Part IV.

Yes [x] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>Partnership Interest 03/31/19</td>
<td>280</td>
<td>280</td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

Property with built-in loss

Totals 280 280

#### 11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?

Yes [x] No

#### 12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?

Yes [x] No

#### 12b. Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?

Yes [x] No

#### 12c. Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?

Yes [x] No

#### 12d. Enter the transferred loss amount included in gross income as required under section 911.

Enter $ __________

#### 13. Did the transferor transfer property described in section 367(d)(4)?

Yes [x] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
### Part IV Additional Information Regarding Transfer of Property

| 14a | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? | Yes | No |
| 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 |

#### Supplemental Part III Information Required To Be Reported

- Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before __% (b) After __% 
- Type of nonrecognition transaction (see instructions) | IRC SECTION 351
- 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 
  - Gain recognition under section 904(f)(5)(F) | Yes | X | No 
  - Recapture under section 1503(d) | Yes | X | No 
  - Exchange gain under section 987 | Yes | X | No 
- Did this transfer result from a change in entity classification? | Yes | X | No 
- Did a domestic corporation make a distribution of property covered by section 367(e)(2)? | Yes | X | No 
- Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? | Yes | X | No 

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Form 926 (Rev. 11-2018) MINNESOTA COMMUNITY FOUNDATION 41-0832480 Page 3
Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☑ 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? ☑ No
   b Did the transferor remain in existence after the transfer? ☑ No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder  Identifying number

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☑ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation  EIN of parent corporation

If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), list the name and EIN of the transferor's partnership.

Name of partnership  EIN of partnership

THE COMMUNITY INVESTMENT GROUP  41-1765364

b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? ☑ No

c Is the partner disposing of its entire interest in the partnership? ☑ No

d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? ☑ No

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN SANMORI, LLC

6 Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN  CJ KY1-1104  CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)

CJ

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a)</th>
<th>(b)</th>
<th>(c)</th>
<th>(d)</th>
<th>(e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of property</td>
<td>Date of transfer</td>
<td>Description of property</td>
<td>Fair market value on date of transfer</td>
<td>Cost or other basis</td>
</tr>
<tr>
<td><strong>Cash</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
☐ Yes ☒ No

If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a)</th>
<th>(b)</th>
<th>(c)</th>
<th>(d)</th>
<th>(e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of property</td>
<td>Date of transfer</td>
<td>Description of property</td>
<td>Fair market value on date of transfer</td>
<td>Cost or other basis</td>
</tr>
<tr>
<td><strong>Stock and securities</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Inventory</strong></td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>103</td>
<td>103</td>
</tr>
<tr>
<td><strong>Other property</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Property with built-in loss</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| **Totals** | | | | | 103 103

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
☐ Yes ☒ No

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?  
☐ Yes ☒ No

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?  
☐ Yes ☒ No

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 u $  
☐ Yes ☒ No

If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a)</th>
<th>(b)</th>
<th>(c)</th>
<th>(d)</th>
<th>(e)</th>
<th>(f)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type of property</td>
<td>Date of transfer</td>
<td>Description of property</td>
<td>Useful life</td>
<td>Arm’s length price on date of transfer</td>
<td>Cost or other basis</td>
</tr>
<tr>
<td><strong>Property described in sec. 367(d)(4)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Totals</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
### Part IV  Additional Information Regarding Transfer of Property (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14c 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?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14d If the answer to line 14c is &quot;Yes,&quot; 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) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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)?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Supplemental Part III Information Required To Be Reported (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before % (b) After %</td>
<td></td>
<td></td>
</tr>
<tr>
<td>17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351</td>
<td></td>
<td></td>
</tr>
<tr>
<td>18 Indicate whether any transfer reported in Part III is subject to any of the following.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>a Gain recognition under section 904(f)(3)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>b Gain recognition under section 904(f)(5)(F)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>c Recapture under section 1503(d)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>d Exchange gain under section 987</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>19 Did this transfer result from a change in entity classification?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If &quot;Yes,&quot; complete lines 20b and 20c.</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>
Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION 41–0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ No
   b Did the transferor remain in existence after the transfer? □ Yes □ No

If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder
   Identifying number

   
   
   

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

   
   
   

   d Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a List the name and EIN of the transferor's partnership.

Name of partnership

EIN of partnership

   THE COMMUNITY INVESTMENT GROUP 41–1765364

   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 established securities market? □ Yes □ No

Part II  Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN TANOHATA, LLC

   6 Address (including country)
      UGLAND HOUSE, SOUTH CHURCH STREET
      GEORGE TOWN CJ KY1–1104 CAYMAN ISLANDS

   7 Country code of country of incorporation or organization (see instructions)
      CJ

   8 Foreign law characterization (see instructions)
      CORPORATION

   9 Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**10** Was cash the only property transferred?  
- Yes ☑ No  
  If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>34</td>
<td>34</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>34</td>
<td>34</td>
<td></td>
</tr>
</tbody>
</table>

**11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
- Yes ☑ No  

**12a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
- Yes ☑ No  
  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?  
- Yes ☑ No  
  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?  
- Yes ☑ No  
  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 u $  
- Yes ☑ No  
  If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
Part IV Additional Information Regarding Transfer of Property (see instructions)

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
Yes ☐ No ☐

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
Yes ☐ No ☐

c 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) u $ _______.

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

---

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
(a) Before ________%  (b) After ________%  
IRC SECTION 351

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

a Gain recognition under section 904(f)(3)  
Yes ☐ No ☐
b Gain recognition under section 904(f)(5)(F)  
Yes ☐ No ☐
c Recapture under section 1503(d)  
Yes ☐ No ☐
d Exchange gain under section 987  
Yes ☐ No ☐

19 Did this transfer result from a change in entity classification?  
Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
If “Yes,” complete lines 20b and 20c.
Yes ☐ No ☐

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ _______.  
Yes ☐ No ☐
c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
Yes ☐ No ☐

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
Yes ☐ No ☐
Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number

41–0832480

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  .................................................................  Yes  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  No

b  Did the transferor remain in existence after the transfer?  .................................................................  Yes  No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number


c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  .................................................................  Yes  No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


d  Have basis adjustments under section 367(a)(4) been made?  .................................................................  Yes  No

3  If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a  List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

THE COMMUNITY INVESTMENT GROUP

41–1765364

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 established securities market?  .................................................................  Yes  No

Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation)

BCPE BREEZE CAYMAN TSUKIKOSHIGENYA

5a  Identifying number, if any

5b  Reference ID number (see instructions)

Address (including country)

UGLAND HOUSE, SOUTH CHURCH STREET

GEORGE TOWN  CJ  KY1–1104  CAYMAN ISLANDS

Country code of country of incorporation or organization (see instructions)

CJ

8  Foreign law characterization (see instructions)

CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation?  .................................................................  Yes  No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III  Information Regarding Transfer of Property  (see instructions)

**Section A—Cash**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

**Section B—Other Property (other than intangible property subject to section 367(d))**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>159</td>
<td>159</td>
<td></td>
</tr>
</tbody>
</table>

Other property  
(not listed under another category)

<table>
<thead>
<tr>
<th>Property with built-in loss</th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>

Totals  
159 159

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12a.

12a 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 u $ __________________

13 Did the transferor transfer property described in section 367(d)(4)?  
If "No," skip Section C and questions 14a through 15.

**Section C—Intangible Property Subject to Section 367(d)**

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td>(a)</td>
<td>(b)</td>
<td></td>
<td>(c)</td>
</tr>
</tbody>
</table>

Totals

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Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ................................................................. [ ] Yes [ ] No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ................................................................. [ ] Yes [ ] No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _________ % (b) After _________ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) [ ] Yes [ ] No
   b Gain recognition under section 904(f)(5)(F) [ ] Yes [ ] No
   c Recapture under section 1503(d) [ ] Yes [ ] No
   d Exchange gain under section 987 [ ] Yes [ ] No

19 Did this transfer result from a change in entity classification? [ ] Yes [ ] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If “Yes,” complete lines 20b and 20c.
   [ ] Yes [ ] No

   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ ________________________________

   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? [ ] Yes [ ] No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions [ ] Yes [ ] No
Form 926
Return by a U.S. Transferor of Property to a Foreign Corporation
(Rev. November 2018)
Internal Revenue Service

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number (see instructions)
41–0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes X No

2 If the transferor was a corporation, complete questions 2a through 2d.
   a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? □ Yes □ No
   b Did the transferor remain in existence after the transfer? □ Yes □ No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder Identifying number

   □ Yes □ No

   d Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a List the name and EIN of the transferor’s partnership.

   Name of partnership EIN of partnership

   □ THE COMMUNITY INVESTMENT GROUP 41–1765364

   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 established securities market? □ Yes □ No

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)
   BCPE BREEZE CAYMAN UKUJIMA, LLC

5a Identifying number, if any
   5b Reference ID number (see instructions)
   □ BCPEUKUJIMA

6 Address (including country)
   UGLAND HOUSE, SOUTH CHURCH STREET
   GEORGE TOWN CJ KY1–1104 CAYMAN ISLANDS

7 Country code of country of incorporation or organization (see instructions)
   CJ

8 Foreign law characterization (see instructions)
   CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>274</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?

If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19</td>
<td>PARTNERSHIP INTEREST</td>
<td>274</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?

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?

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?

d Enter the transferred loss amount included in gross income as required under section 911.

13 Did the transferor transfer property described in section 367(d)(4)?

If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

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Form 926 (Rev. 11-2018)

DAA
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life 
reasonably anticipated to exceed 20 years? Yes ☐ No ☐  
b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Yes ☐ No ☐  
c 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 ☐  
Supplemental Part III Information Required To Be Reported (see instructions) 

Part IV Additional Information Regarding Transfer of Property (see instructions) 

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer. 
(a) Before _____ % (b) After _____ %  
17 Type of nonrecognition transaction (see instructions) IRC SECTION 351  
18 Indicate whether any transfer reported in Part III is subject to any of the following. 
   a Gain recognition under section 904(f)(3) Yes ☐ No ☒  
   b Gain recognition under section 904(f)(5)(F) Yes ☒ No ☐  
   c Recapture under section 1503(d) Yes ☒ No ☐  
   d Exchange gain under section 987 Yes ☒ No ☐  
19 Did this transfer result from a change in entity classification? Yes ☒ No ☐  
20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 
   If “Yes,” complete lines 20b and 20c. Yes ☒ No ☐  
   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  
   c Did the domestic corporation not recognize gain or loss on the distribution of property because the 
property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes ☒ No ☐  
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation 
covered by section 367(e)(1)? See instructions Yes ☒ No ☐
**Form 926**

_Return by a U.S. Transferor of Property to a Foreign Corporation_

**Part I U.S. Transferor Information**

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MINNESOTA COMMUNITY FOUNDATION</td>
<td>41–0832480</td>
</tr>
</tbody>
</table>

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
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<tbody>
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<tr>
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<td></td>
</tr>
</tbody>
</table>

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
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<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

   a List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   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 established securities market? □ Yes □ No

**Part II Transferee Foreign Corporation Information**

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>BCPE BREEZE CAYMAN YOKOHAMA, LLC</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address (including country)</th>
<th>Country code of country of incorporation or organization</th>
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</thead>
<tbody>
<tr>
<td>UGLAND HOUSE, SOUTH CHURCH STREET</td>
<td>GEORGE TOWN CAYMAN ISLANDS</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Country code of country of incorporation or organization</th>
<th>Foreign law characterization (see instructions)</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>CORPORATION</td>
</tr>
</tbody>
</table>

9 Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10. Was cash the only property transferred? [ ] Yes [x] No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/31/19 PARTNERSHIP INTEREST</td>
<td>644</td>
<td>644</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>644 644</td>
</tr>
</tbody>
</table>

11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [x] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 911. $ __________________________

13. Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [x] No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

DAA
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ................................................................. Yes No
b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ................................................................. Yes No
c 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) u $ .................................................................
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

Supplemental Part III Information Required To Be Reported (see instructions)


Part IV  Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _______%  (b) After _______%  
17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351
18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) ................................................................. Yes No
   b Gain recognition under section 904(f)(5)(F) ................................................................. Yes No
   c Recapture under section 1503(d) ................................................................. Yes No
   d Exchange gain under section 987 ................................................................. Yes No
19 Did this transfer result from a change in entity classification? ................................................................. Yes No
20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  ................................................................. Yes No
   If “Yes,” complete lines 20b and 20c.
   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ .................................................................
   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? ................................................................. Yes No
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  ................................................................. Yes No
Minnesota Community Foundation 41-0832480

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [x] No

2. If the transferor was a corporation, complete questions 2a through 2d.
   a. If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? [ ] Yes [ ] No
   b. Did the transferor remain in existence after the transfer? [ ] Yes [ ] No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder  Identification number

   If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation  EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] No

   3. If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a. List the name and EIN of the transferor’s partnership.

   Name of partnership  EIN of partnership

   THE COMMUNITY INVESTMENT GROUP 41-1765364

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [x] No
   c. Is the partner disposing of its entire interest in the partnership? [ ] Yes [x] No
   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [ ] Yes [x] No

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)
   CANBRIDGE PHARMACEUTICALS INC.

   5a. Identifying number, if any

5b. Reference ID number

   6. Address (including country)
      FLAT 303A, 106 LI ZE ZHONG
      BEIJING CH CHINA, PEOPLES REPUB

   7. Country code of country of incorporation or organization (see instructions)
      CJ

   8. Foreign law characterization (see instructions)
      CORPORATION

   9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
- Yes ☒  
- No  

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>08/23/18</td>
<td>STOCK</td>
<td>6</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>6</td>
<td>6</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
- Yes  
- ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
- Yes  
- ☒ No

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?  
- Yes  
- No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
- Yes  
- No

d Enter the transferred loss amount included in gross income as required under section 91 u.  
- ☒ Yes  
- No

13 Did the transferor transfer property described in section 367(d)(4)?  
- Yes  
- ☒ No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
### Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c  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?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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)?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Supplemental Part III Information Required To Be Reported (see instructions)

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Form 926 (Rev. 11-2018)  MINNESOTA COMMUNITY FOUNDATION  41-0832480

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16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before ________ %  (b) After ________ %  

---

17  Type of nonrecognition transaction (see instructions)  

---

18  Indicate whether any transfer reported in Part III is subject to any of the following.

(a) Gain recognition under section 904(f)(3)  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(b) Gain recognition under section 904(f)(5)(F)  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

c  Recapture under section 1503(d)  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

d  Exchange gain under section 987  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

19  Did this transfer result from a change in entity classification?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)?  

If “Yes,” complete lines 20b and 20c.

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  

|       |     |    |

c  Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)?  

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>X</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

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Form 926

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

(Rev. November 2018)

Department of the Treasury
Internal Revenue Service

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

Attachment

Sequence No. 128

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number (see instructions)

41–0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| d Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
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<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

CBC KETO PUMPS SARL

5a Identifying number, if any

Identifying number

41–1765364

5b Reference ID number (see instructions)

Reference ID number

CBCKETO

6 Address (including country)

8–10 AVENUE DE LA GARE

LUXEMBOURG LU L–1610 LUXEMBOURG

7 Country code of country of incorporation or organization (see instructions)

LU

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7,831</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
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<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY–GBP</td>
<td>2</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>2</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
If "Yes," go to line 12b.

12a 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 u $ __________  
If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Part IV  Additional Information Regarding Transfer of Property  

14a  Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  

b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  

c  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?  

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)?

Supplemental Part III Information Required To Be Reported  

Part IV  Additional Information Regarding Transfer of Property
Form 926
Return by a U.S. Transferor of Property
to a Foreign Corporation

Part I  U.S. Transferor Information  (see instructions)

Name of transferor

<table>
<thead>
<tr>
<th>CONTROLLING SHAREHOLDER</th>
<th>IDENTIFYING NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? 
   Yes [x] No

2 If the transferor was a corporation, complete questions 2a through 2d.
   a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by
      five or fewer domestic corporations? 
      Yes [x] No
   b Did the transferor remain in existence after the transfer? 
      Yes [x] No
      If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>CONTROLLING SHAREHOLDER</th>
<th>IDENTIFYING NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
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</tbody>
</table>

3 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.

<table>
<thead>
<tr>
<th>NAME OF PARENT CORPORATION</th>
<th>EIN OF PARENT CORPORATION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

4 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.

<table>
<thead>
<tr>
<th>NAME OF PARTNERSHIP</th>
<th>EIN OF PARTNERSHIP</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Part II  Transferee Foreign Corporation Information  (see instructions)

Name of transferee (foreign corporation)

<table>
<thead>
<tr>
<th>ADDRESS (INCLUDING COUNTRY)</th>
</tr>
</thead>
<tbody>
<tr>
<td>8TH FLOOR, NEWTON TOWER</td>
</tr>
<tr>
<td>PORT LOUIS MP MAURITIUS</td>
</tr>
</tbody>
</table>

| COUNTRY CODE OF COUNTRY OF INCORPORATION OR ORGANIZATION (SEE INSTRUCTIONS) |
| MP |

| FOREIGN LAW CHARACTERIZATION (SEE INSTRUCTIONS) |
| CORPORATION |

5a Identifying number, if any

5b Reference ID number (see instructions)

6 Foreign law characterization (see instructions)

8 Is the transferee foreign corporation a controlled foreign corporation? 
   Yes [x] No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>07/12/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>281</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stock and securities</td>
<td>07/12/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>281</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ❌ Yes ❌ No

If “Yes,” skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>07/12/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>281</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>281</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ❌ Yes ❌ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ❌ Yes ❌ No

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? ❌ Yes ❌ No

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? ❌ Yes ❌ No

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 u $  

13 Did the transferor transfer property described in section 367(d)(4)? ❌ Yes ❌ No

If “No,” skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
Additional Information Regarding Transfer of Property (see instructions)

Part IV

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
Yes  No
b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
Yes  No
c 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) u $ .

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

Supplemental Part III Information Required To Be Reported (see instructions)

---

Part IV  Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
(a) Before _________ %  (b) After _________ %

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
  a Gain recognition under section 904(f)(3)  
  Yes  No
  b Gain recognition under section 904(f)(5)(F)  
  Yes  No
  c Recapture under section 1503(d)  
  Yes  No
  d Exchange gain under section 987  
  Yes  No

19 Did this transfer result from a change in entity classification?  
Yes  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
  If “Yes,” complete lines 20b and 20c.
  Yes  No
  b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ 
  c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
  Yes  No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
Yes  No
Form 926
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information  (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

41–0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  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  No

   b Did the transferor remain in existence after the transfer?  Yes  No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder
   Identifying number

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation
   EIN of parent corporation

   d Have basis adjustments under section 367(a)(4) been made?  Yes  No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

   a List the name and EIN of the transferor's partnership.

   Name of partnership
   EIN of partnership

THE COMMUNITY INVESTMENT GROUP

41–1765364

   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 established securities market?  Yes  No

Part II  Transferee Foreign Corporation Information  (see instructions)

4 Name of transferee (foreign corporation)

EXCELLENCE LOGGING GUERNSEY CO LTD

5a Identifying number, if any

6 Address (including country)

EAST WING, TRAFALGAR COURT
ST PETER PORT GK GY1 3PP GUERNSEY

5b Reference ID number

EXCELLENCE

7 Country code of country of incorporation or organization (see instructions)

GK

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
</tbody>
</table>

10. Was cash the only property transferred? [ ] Yes [X] No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>04/27/18</td>
<td>STOCK &amp; SECURITIES</td>
<td>7,635</td>
<td>7,635</td>
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</tr>
<tr>
<td>Inventory</td>
<td></td>
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<tr>
<td>Other property (not listed under another category)</td>
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<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7,635</td>
</tr>
</tbody>
</table>

11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [X] No

12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [X] No

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? [ ] Yes [X] No

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? [ ] Yes [X] No

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 911 $ ____________________

13. Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [X] No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
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</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? 

- Yes  - No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? 

- Yes  - No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before ______%, (b) After ______%

17 Type of nonrecognition transaction (see instructions) IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

- Yes - No

a Gain recognition under section 904(f)(3) 

b Gain recognition under section 904(f)(5)(F) 

c Recapture under section 1503(d) 

d Exchange gain under section 987 

19 Did this transfer result from a change in entity classification? 

- Yes - No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 

- Yes - No

If “Yes,” complete lines 20b and 20c.

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ _______. 

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? 

- Yes - No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions 

- Yes - No
**Form 926**

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

*Go to [www.irs.gov/Form926](http://www.irs.gov/Form926) for instructions and the latest information.*

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

---

### Part I  U.S. Transferor Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferor</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td>MINNESOTA COMMUNITY FOUNDATION</td>
<td>41–0832480</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Yes  
   - 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  
     - 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).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
  - Yes  
  - No

If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- d. Have basis adjustments under section 367(a)(4) been made?  
  - Yes  
  - No

3. If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   - a. List the name and EIN of the transferor’s partnership.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE COMMUNITY INVESTMENT GROUP</td>
<td>41–1765364</td>
</tr>
</tbody>
</table>

   - 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 established securities market?  
     - Yes  
     - No

---

### Part II  Transferee Foreign Corporation Information (see instructions)

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>5a Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>FORGE OIL &amp; GAS LIMITED</td>
<td></td>
</tr>
</tbody>
</table>

5b Reference ID number (see instructions)

<table>
<thead>
<tr>
<th>Country code of country of incorporation or organization (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
</tr>
</tbody>
</table>

| 9 | Is the transferee foreign corporation a controlled foreign corporation?  
|---|---------------------------|
|   | Yes  
|   | No

---

*For Paperwork Reduction Act Notice, see separate instructions.*

DAA
**Part III Information Regarding Transfer of Property**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  
   Yes  No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY – CAD</td>
<td>108</td>
<td>108</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>108</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   Yes  No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   Yes  No

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?  
   Yes  No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
   Yes  No

d Enter the transferred loss amount included in gross income as required under section 91 u d  
   No  $  

13 Did the transferor transfer property described in section 367(d)(4)?  
   Yes  No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Totals</td>
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</tr>
</tbody>
</table>
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ................................................................. Yes ☐ No ☐

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ................................................................. Yes ☐ No ☐

c 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) u $ ____________

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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before ____________ %  (b) After ____________ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) ................................................. Yes ☒ No ☐
   b Gain recognition under section 904(f)(5)(F) ............................................. Yes ☒ No ☐
   c Recapture under section 1503(d) ................................................................. Yes ☒ No ☐
   d Exchange gain under section 987 ................................................................. Yes ☒ No ☐

19 Did this transfer result from a change in entity classification? ................................................................. Yes ☐ No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If “Yes,” complete lines 20b and 20c.
   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ ____________
   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? ................................................................. Yes ☐ No ☐

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions ................................................................. Yes ☒ No ☐
Form 926
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION 41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  Yes  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  No
   b Did the transferor remain in existence after the transfer?  Yes  No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder

   Identifying number

  ...

   c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  Yes  No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

  ...

   d Have basis adjustments under section 367(a)(4) been made?  Yes  No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

   THE COMMUNITY INVESTMENT GROUP 41-1765364

   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 established securities market?  Yes  No

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

   HPT FUNDO DE INVESTIMENTO EM 98-1238227

   Address (including country)

   1001 PENNSYLVANIA AVE NW, SUITE 220 DC
   SOUTH WASHINGTON 20004

   Country code of country of incorporation or organization (see instructions)

   BR

   Foreign law characterization (see instructions)

   CORPORATION

   Is the transferee foreign corporation a controlled foreign corporation?  Yes  No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? □ Yes □ No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>02/27/18 STOCK</td>
<td>3</td>
<td>3</td>
<td></td>
</tr>
</tbody>
</table>

Inventory

Other property

(not listed under another category)

Property with built-in loss

Totals 3 3

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
### Part IV  Additional Information Regarding Transfer of Property (see instructions)

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>14a</td>
<td>Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
<td>Yes</td>
</tr>
<tr>
<td>b</td>
<td>At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
<td>Yes</td>
</tr>
<tr>
<td>c</td>
<td>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?</td>
<td>Yes</td>
</tr>
<tr>
<td>d</td>
<td>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) $</td>
<td></td>
</tr>
<tr>
<td>15</td>
<td>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)?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

### Supplemental Part III Information Required To Be Reported (see instructions)

<p>| |</p>
<table>
<thead>
<tr>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
</tr>
</tbody>
</table>

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

**MINNESOTA COMMUNITY FOUNDATION**

**41-0832480**

**Page 3**

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DAA
**Part I  U.S. Transferor Information**

**Name of transferor**

<table>
<thead>
<tr>
<th>MINNESOTA COMMUNITY FOUNDATION</th>
<th>41-0832480</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1</strong> Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td>No</td>
</tr>
<tr>
<td><strong>2 a</strong> 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?</td>
<td>No</td>
</tr>
<tr>
<td><strong>b</strong> Did the transferor remain in existence after the transfer?</td>
<td>No</td>
</tr>
<tr>
<td><strong>c</strong> If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?</td>
<td>No</td>
</tr>
<tr>
<td><strong>d</strong> Have basis adjustments under section 367(a)(4) been made?</td>
<td>No</td>
</tr>
</tbody>
</table>

**Controlling shareholder**

<table>
<thead>
<tr>
<th>Identifying number</th>
</tr>
</thead>
</table>

**Name of parent corporation**

<table>
<thead>
<tr>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

**Name of partnership**

<table>
<thead>
<tr>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

**Part II  Transferee Foreign Corporation Information**

**Name of transferee (foreign corporation)**

<table>
<thead>
<tr>
<th>MELTWATER HOLDING B.V.</th>
</tr>
</thead>
</table>

**Address (including country)**

<table>
<thead>
<tr>
<th>SINGEL 250</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMSTERDAM NL 1016 AB NETHERLANDS</td>
</tr>
</tbody>
</table>

**Country code of country of incorporation or organization**

| NL |

**Foreign law characterization**

| CORPORATION |

| Is the transferee foreign corporation a controlled foreign corporation? | No |

**Reference ID number**

| MELTWATER |

For Paperwork Reduction Act Notice, see separate instructions.
**Part III Information Regarding Transfer of Property (see instructions)**

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☑ No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>03/01/19</td>
<td>LOAN/ACCRUED INTEREST</td>
<td>79</td>
<td>79</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Property with built-in loss

Totals 79 79

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☑ Yes ☐ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☑ Yes ☐ No

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? ☐ Yes ☑ No

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? ☑ Yes ☐ No

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 u $  

13 Did the transferor transfer property described in section 367(d)(4)? ☑ Yes ☐ No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
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</tbody>
</table>

Totals
### Part IV  Additional Information Regarding Transfer of Property (see instructions)

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td>14a</td>
<td>Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
</tr>
<tr>
<td>b</td>
<td>At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
</tr>
<tr>
<td>c</td>
<td>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?</td>
</tr>
<tr>
<td>d</td>
<td>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) U $</td>
</tr>
<tr>
<td>15</td>
<td>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)?</td>
</tr>
</tbody>
</table>

### Supplemental Part III Information Required To Be Reported (see instructions)

<p>| | |</p>
<table>
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</tbody>
</table>

### Part IV  Additional Information Regarding Transfer of Property (see instructions)

#### 16
Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before ________%  (b) After ________%

#### 17
Type of nonrecognition transaction (see instructions) U IRC SECTION 351

#### 18
Indicate whether any transfer reported in Part III is subject to any of the following.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a</td>
<td>Gain recognition under section 904(f)(3)</td>
</tr>
<tr>
<td>b</td>
<td>Gain recognition under section 904(f)(5)(F)</td>
</tr>
<tr>
<td>c</td>
<td>Recapture under section 1503(d)</td>
</tr>
<tr>
<td>d</td>
<td>Exchange gain under section 987</td>
</tr>
</tbody>
</table>

#### 19
Did this transfer result from a change in entity classification?  | [ ] Yes  | [ ] No |

If “Yes,” complete lines 20b and 20c.

#### 20a
Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

If “Yes,” complete lines 20b and 20c.

#### 20b
Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) U $  |   |

#### 21
Did a domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?

<p>| | |</p>
<table>
<thead>
<tr>
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<tbody>
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</tbody>
</table>

Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions

<p>| | |</p>
<table>
<thead>
<tr>
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</thead>
<tbody>
<tr>
<td></td>
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</tbody>
</table>

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Form 926 (Rev. 11-2018) MINNESOTA COMMUNITY FOUNDATION 41-0832480
**Form 926**

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

**Part I**  
**U.S. Transferor Information** (see instructions)

**Name of transferor**

**MINNESOTA COMMUNITY FOUNDATION**

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2  If the transferor was a corporation, complete questions 2a through 2d.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>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?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b  Did the transferor remain in existence after the transfer?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Have basis adjustments under section 367(a)(4) been made?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</tr>
</tbody>
</table>

**Part II**  
**Transferee Foreign Corporation Information** (see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>5a Identifying number, if any</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5b Reference ID number</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MONT BLANC BRANDS HOLDINGS S.A.R.L.</strong></td>
<td></td>
</tr>
</tbody>
</table>

6  Address (including country)

| 7 RUE LOU HEMMER | LUXEMBOURG | LU L-1748 LUXEMBOURG |

| Country code of country of incorporation or organization (see instructions) | LU |

<table>
<thead>
<tr>
<th>Foreign law characterization (see instructions)</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Is the transferee foreign corporation a controlled foreign corporation?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>64</td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.
   ☐ Yes ☒ No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>PROPERTY</td>
<td>382</td>
<td>382</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>382</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   ☐ Yes ☒ No

12a 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.
   ☐ Yes ☒ No

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.
   ☐ Yes ☒ No

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.
   ☐ Yes ☒ No

d Enter the transferred loss amount included in gross income as required under section 91  
   ☐ Yes ☒ No

13 Did the transferor transfer property described in section 367(d)(4)?  
   If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

---

Form 926 (Rev. 11-2018)
Part IV  Additional Information Regarding Transfer of Property (see instructions)

16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
    (a) Before ________ %  (b) After ________ %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following.
    a Gain recognition under section 904(f)(3) Yes [x] No
    b Gain recognition under section 904(f)(5)(F) Yes [x] No
    c Recapture under section 1503(d) Yes [x] No
    d Exchange gain under section 987 Yes [x] No

19  Did this transfer result from a change in entity classification? Yes [x] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
    If “Yes,” complete lines 20b and 20c.
    b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ ________
    c Did the domestic corporation not recognize gain or loss on the distribution of property because the
       property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?
       Yes [x] No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
       covered by section 367(e)(1)? See instructions
       Yes [x] No
Return by a U.S. Transferor of Property
to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor
MINNESOTA COMMUNITY FOUNDATION
Identifying number
41-0832480

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [X] No

2. If the transferor was a corporation, complete questions 2a through 2d.
   a. If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? [ ] Yes [ ] No
   b. Did the transferor remain in existence after the transfer? [ ] Yes [ ] No

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder

   Identifying number

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? [ ] Yes [ ] No

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made? [ ] Yes [ ] No

   If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

   a. List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

THE COMMUNITY INVESTMENT GROUP
41-1765364

b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [X] No

c. Is the partner disposing of its entire interest in the partnership? [X] Yes [ ] No

d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [ ] Yes [X] No

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)
   MOVENTAS HOLDINGS (LUXEMBOURG) SARL

5a. Identifying number, if any

5b. Reference ID number

   MOVENTAS

6. Address (including country)
   8-10 AVENUE DE LA GARE
   LUXEMBOURG LU L-1610 LUXEMBOURG

7. Country code of country of incorporation or organization (see instructions)
   LU

8. Foreign law characterization (see instructions)
   CORPORATION

9. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [X] No
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
- Yes  
- No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY – GBP</td>
<td>298</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>298</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
- Yes  
- No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
- Yes  
- No

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?  
- Yes  
- No

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?  
- Yes  
- No

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 u $  

13 Did the transferor transfer property described in section 367(d)(4)?  
- Yes  
- No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ○ Yes ☑ No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ○ Yes ☑ No

c 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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before % (b) After %

17 Type of nonrecognition transaction (see instructions) □ IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

a Gain recognition under section 904(f)(3) □ Yes ☑ No

b Gain recognition under section 904(f)(5)(F) □ Yes ☑ No

c Recapture under section 1503(d) □ Yes ☑ No

d Exchange gain under section 987 □ Yes ☑ No

19 Did this transfer result from a change in entity classification? □ Yes ☑ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

If “Yes,” complete lines 20b and 20c.

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $  

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? □ Yes ☑ No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions □ Yes ☑ No
**Part I  U.S. Transferor Information (see instructions)**

**Name of transferor**

<table>
<thead>
<tr>
<th>MINNESOTA COMMUNITY FOUNDATION</th>
<th>41–0832480</th>
</tr>
</thead>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation?  
   - Answer: 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?  
      - Answer: No

   b. Did the transferor remain in existence after the transfer?  
      - Answer: Yes

   If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?  
      - Answer: No

   If not, list the name and employer identification number (EIN) of the parent corporation.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

   d. Have basis adjustments under section 367(a)(4) been made?  
      - Answer: 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.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
<tbody>
<tr>
<td>THE COMMUNITY INVESTMENT GROUP</td>
<td>41–1765364</td>
</tr>
</tbody>
</table>

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets?  
      - Answer: No

   c. Is the partner disposing of its entire interest in the partnership?  
      - Answer: No

   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?  
      - Answer: Yes

**Part II  Transferee Foreign Corporation Information (see instructions)**

4. Name of transferee (foreign corporation)

<table>
<thead>
<tr>
<th>NAPSBURY LIMITED</th>
</tr>
</thead>
</table>

5a. Identifying number, if any

<table>
<thead>
<tr>
<th>5a</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
</tr>
</tbody>
</table>

5b. Reference ID number (see instructions)

   | NAPSBURY |

6. Address (including country)

   | WEST SUSSEX, UK BN12 4NG GREAT BRITAIN (UK) |

7. Country code of country of incorporation or organization (see instructions)

   | UK |

8. Foreign law characterization (see instructions)

   | CORPORATION |

9. Is the transferee foreign corporation a controlled foreign corporation?  
   - Answer: No

For Paperwork Reduction Act Notice, see separate instructions.
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td>03/31/19</td>
<td></td>
<td>53</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10. Was cash the only property transferred? ☐ Yes ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>03/31/19</td>
<td>STOCK</td>
<td>74</td>
<td>74</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>74</td>
<td>74</td>
<td></td>
</tr>
</tbody>
</table>

11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☒ Yes ☐ No

12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☒ Yes ☐ No

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? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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 911. □ $ ______________________

13. Did the transferor transfer property described in section 367(d)(4)? ☒ Yes ☐ No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Arm's length price on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals | | | | | |

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? [ ] Yes [ ] No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? [ ] Yes [ ] No

c 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

**Supplemental Part III Information Required To Be Reported (see instructions)**

**Part IV Additional Information Regarding Transfer of Property (see instructions)**

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _________% (b) After _________%

17 Type of nonrecognition transaction (see instructions) [ ] IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) [ ] Yes [ ] No
   b Gain recognition under section 904(f)(5)(F) [ ] Yes [ ] No
   c Recapture under section 1503(d) [ ] Yes [ ] No
   d Exchange gain under section 987 [ ] Yes [ ] No

19 Did this transfer result from a change in entity classification? [ ] Yes [ ] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.
   If “Yes,” complete lines 20b and 20c.
   [ ] Yes [ ] No

20b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ __________

20c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? [ ] Yes [ ] No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions. [ ] Yes [ ] No
Form 926
Return by a U.S. Transferor of Property
to a Foreign Corporation

Part I  U.S. Transferor Information
(see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION
41-0832480

Identifying number (see instructions)

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? □ Yes □ 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 □ No
   b Did the transferor remain in existence after the transfer? □ Yes □ No
      If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number

If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? □ Yes □ No
      If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

Have basis adjustments under section 367(a)(4) been made? □ Yes □ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
   a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

THE COMMUNITY INVESTMENT GROUP
41-1765364

Did the partner pick up its pro rata share of gain on the transfer of partnership assets? □ Yes □ No

Is the partner disposing of its entire interest in the partnership? □ Yes □ No

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)

Name of transferee (foreign corporation)

PYRAMID HOLDINGS B.V.

Identifying number, if any

5a

Address (including country)

JOLLENMANKOF 22

Amsterdam NL 1019GW Netherlands

5b Reference ID number

(see instructions)

5b

Country code of country of incorporation or organization (see instructions)

NL

Foreign law characterization (see instructions)

CORPORATION

Is the transferee foreign corporation a controlled foreign corporation? □ Yes □ No
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   ![Yes](X) No

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>05/29/18 PROMISSORY NOTE</td>
<td>7</td>
<td>7</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>7</td>
<td>7</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   ![Yes](X) No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   ![Yes](X) No

  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?  
   ![Yes](X) No

  c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
   ![Yes](X) No

  d Enter the transferred loss amount included in gross income as required under section 91 u $  

13 Did the transferor transfer property described in section 367(d)(4)?  
   ![Yes](X) No

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ☐ Yes ☐ No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ☐ Yes ☐ No

c 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) in $ _______________.

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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _________ %  (b) After _________ %

17 Type of nonrecognition transaction (see instructions) ☐ IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) ☐ Yes ☐ No
   b Gain recognition under section 904(f)(5)(F) ☐ Yes ☐ No
   c Recapture under section 1503(d) ☐ Yes ☐ No
   d Exchange gain under section 987 ☐ Yes ☐ No

19 Did this transfer result from a change in entity classification? ☐ Yes ☐ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
   If “Yes,” complete lines 20b and 20c.
   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) in $ _______________
   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? ☐ Yes ☐ No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions ☐ Yes ☐ No

Form 926 (Rev. 11-2018)   MINNESOTA COMMUNITY FOUNDATION  41-0832480   Page 3
Minneso ta Community Foundation

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? No

2a If the transferor was a corporation, complete questions 2a through 2d.

2b Did the transferor remain in existence after the transfer? No

3a If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? No

4a Name of transferee foreign corporation

4b Address (including country)

5a Identifying number, if any

5b Reference ID number (see instructions)

6a Country code of country of incorporation or organization (see instructions)

7a Foreign law characterization (see instructions)
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
   If "Yes," skip the remainder of Part III and go to Part IV.  
   [ ] Yes  [x] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>10/23/19</td>
<td>STOCKS &amp; SECURITIES</td>
<td>21</td>
<td>21</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>21 21</td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   [ ] Yes  [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   [ ] Yes  [x] No

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?  
   [ ] Yes  [ ] No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
   [ ] Yes  [ ] No

d Enter the transferred loss amount included in gross income as required under section 91 u $ __________________________

13 Did the transferor transfer property described in section 367(d)(4)?  
   [ ] Yes  [x] No

If "No," skip Section C and questions 14a through 15.

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Supplemental Part III Information Required To Be Reported (see instructions)**

**Part IV Additional Information Regarding Transfer of Property (see instructions)**

14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
- Yes  - No  

14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
- Yes  - No  

14c 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  

14d 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) u $  

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  

16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.  
- (a) Before %  - (b) After %  

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351  

18 Indicate whether any transfer reported in Part III is subject to any of the following.  
- a Gain recognition under section 904(f)(3)  
- b Gain recognition under section 904(f)(5)(F)  
- c Recapture under section 1503(d)  
- d Exchange gain under section 987  
- e Exchange gain under section 987  
- f Exchange gain under section 987  

19 Did this transfer result from a change in entity classification?  
- Yes  - No  

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If “Yes,” complete lines 20b and 20c.  
- Yes  - No  

20b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $  

20c 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  

20d Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
- Yes  - No
Form 926
(Rev. November 2018)
Department of the Treasury
Internal Revenue Service

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

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

U 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

MINNESOTA COMMUNITY FOUNDATION 41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? 

☐ Yes ☒ 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 ☒ No

b Did the transferor remain in existence after the transfer? 

☐ Yes ☒ No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder Identifying number


c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? 

☐ Yes ☒ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation EIN of parent corporation


d Have basis adjustments under section 367(a)(4) been made? 

☐ Yes ☒ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a List the name and EIN of the transferor’s partnership.

Name of partnership EIN of partnership

THE COMMUNITY INVESTMENT GROUP 41-1765364

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 established securities market? 

☐ Yes ☒ No

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

REDWOOD INVESTMENT LTD

5a Identifying number, if any 

20-4748517

5b Reference ID number (see instructions)

6 Address (including country)

8TH FLOOR, NEWTON TOWER

PORT LOUIS MP MAURITIUS

7 Country code of country of incorporation or organization (see instructions)

MP

8 Foreign law characterization (see instructions)

LIMITED COMPANY

☐ Yes ☒ No

9 Is the transferee foreign corporation a controlled foreign corporation? 

☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [x] No

*If "Yes," skip the remainder of Part III and go to Part IV.*

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td>STOCKS &amp; SECURITIES</td>
<td>753</td>
<td>753</td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td>753</td>
<td>753</td>
<td></td>
</tr>
</tbody>
</table>

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [x] No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
   Yes ☐  No ☐

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
   Yes ☐  No ☐

c 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 ☐

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV  Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before _________ %  (b) After _________ %

17 Type of nonrecognition transaction (see instructions)  
   IRC SECTION 351  

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3)  
   b Gain recognition under section 904(f)(5)(F)  
   c Recapture under section 1503(d)  
   d Exchange gain under section 987  
   Yes ☐  No ☐

19 Did this transfer result from a change in entity classification?  
   Yes ☐  No ☐

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
   Yes ☐  No ☐

   If “Yes,” complete lines 20b and 20c.

   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ __________
   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
   Yes ☐  No ☐

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
   Yes ☐  No ☐
Return by a U.S. Transferor of Property to a Foreign Corporation

Form 926
(Rev. November 2018)

Department of the Treasury Internal Revenue Service

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number (see instructions)

41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ 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 ☑ No

b Did the transferor remain in existence after the transfer? ☐ Yes ☑ No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number


c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☑ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation


d Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ No

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

THE COMMUNITY INVESTMENT GROUP

41-1765364

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 established securities market? ☐ Yes ☑ No

Part II  Transferee Foreign Corporation Information (see instructions)

Name of transferee (foreign corporation)

SICCAR POINT GUERNSEY INVESTMENT LT

Identifying number, if any

98-1194788

Address (including country)

EAST WING, TRAFALGAR COURT

ST PETER PORT GY1 3PP GUERNSEY

Country code of country of incorporation or organization (see instructions)

GK

Foreign law characterization (see instructions)

CORPORATION

Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☑ No

For Paperwork Reduction Act Notice, see separate instructions.
## Part III Information Regarding Transfer of Property (see instructions)

### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [ ] No

If "Yes," skip the remainder of Part III and go to Part IV.

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>12/31/18</td>
<td>STOCK &amp; SECURITIES</td>
<td>279,251</td>
<td>279,251</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

| Stock and securities | | 279,251 | 279,251 |  |
| Other property (not listed under another category) | | | | |

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Totals**

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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? [ ] Yes [ ] No

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 911 $ ____________________________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

If "No," skip Section C and questions 14a through 15.

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Form 926 (Rev. 11-2018)
**Supplemental Part III Information Required To Be Reported**

(see instructions)

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**Part IV Additional Information Regarding Transfer of Property**

(see instructions)

<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14c 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?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14d If the answer to line 14c is &quot;Yes,&quot; 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) u $</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14e 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)?</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

MINNESOTA COMMUNITY FOUNDATION 41-0832480

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DAA
Form 926
(Rev. November 2018)

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

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

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number (see instructions)

41-0832480

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☒ No

2  If the transferee was a corporation, complete questions 2a through 2d.

a  If the transfer was a section 361(a) or (b) transfer, was the transferee controlled (under section 368(c)) by five or fewer domestic corporations? ☐ Yes ☒ No

b  Did the transferee remain in existence after the transfer? ☐ Yes ☐ No

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder Identifying number


c  If the transferee was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☒ No

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation EIN of parent corporation

d  Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☒ No

3  If the transferee was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a  List the name and EIN of the transferor's partnership.

Name of partnership EIN of partnership

THE COMMUNITY INVESTMENT GROUP 41-1765364

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 established securities market? ☒ Yes ☐ No

Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation)

STAMPLI LTD

5a  Identifying number, if any

5b  Reference ID number (see instructions)

6  Address (including country)

701 W EVELYN AVENUE, SUITE B  CALIFORNIA

MOUNTAIN VIEW  94041

STAMPLI

7  Country code of country of incorporation or organization (see instructions)

CJ

8  Foreign law characterization (see instructions)

CORPORATION

9  Is the transferee foreign corporation a controlled foreign corporation? ☐ Yes ☒ No

For Paperwork Reduction Act Notice, see separate instructions.

DAA
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? [ ] Yes [ ] No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inventory</td>
<td>05/22/18 SAFE</td>
<td>50</td>
<td>50</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

Property with built-in loss

Totals 50 50

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? [ ] Yes [ ] No

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? [ ] Yes [ ] No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

If "Yes," continue to line 12d. If "No," skip line 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? [ ] Yes [ ] No

d Enter the transferred loss amount included in gross income as required under section 91 u $ __________________________

13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
Part IV  Additional Information Regarding Transfer of Property (see instructions)

16  Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
   (a) Before _________%  (b) After _________%  

17  Type of nonrecognition transaction (see instructions)  u IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following.
   a  Gain recognition under section 904(f)(3)  Yes  No
   b  Gain recognition under section 904(f)(5)(F)  Yes  No
   c  Recapture under section 1503(d)  Yes  No
   d  Exchange gain under section 987  Yes  No

19  Did this transfer result from a change in entity classification?  Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions
    If "Yes," complete lines 20b and 20c.
    a  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)  u $ ____________
    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 covered by section 367(e)(1)? See instructions  Yes  No
Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number (see instructions)

41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes No

2 If the transferee 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 No
    b Did the transferor remain in existence after the transfer? Yes No
        If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number

Name of parent corporation

EIN of parent corporation

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.
    a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

4 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.
    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 established securities market? Yes No

Part II  Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

TEMPUS ENERGY LTD

5a Identifying number, if any

5b Reference ID number (see instructions)

6 Address (including country)

1830, 407-2ND STREET SW ALBERTA CALGARY CA T2P 2Y3 CANADA

TEMPUS

7 Country code of country of incorporation or organization (see instructions)

CA

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? Yes No
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10. Was cash the only property transferred?  
   ☐ Yes ☑ No

If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY – CAD</td>
<td>480</td>
<td>480</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>480</td>
</tr>
</tbody>
</table>

11. Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
   ☐ Yes ☑ No

12a. Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
   ☐ Yes ☑ No

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?  
   ☐ Yes ☑ No

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?  
   ☐ Yes ☑ No

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 u $  
   ☐ Yes ☑ No

13. Did the transferor transfer property described in section 367(d)(4)?  
   ☐ Yes ☑ No

If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm’s length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Form 926 (Rev. 11-2018)
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? .................................................................Yes  No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? .................................................................Yes  No

c 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) u $ _____________________________

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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.
   (a) Before ________ % (b) After ________ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.
   a Gain recognition under section 904(f)(3) .................................................................Yes  No
   b Gain recognition under section 904(f)(5)(F) .................................................................Yes  No
   c Recapture under section 1503(d) .................................................................Yes  No
   d Exchange gain under section 987 .................................................................Yes  No

19 Did this transfer result from a change in entity classification? .................................................................Yes  No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If “Yes,” complete lines 20b and 20c.
   Yes  No

   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ _____________________________

   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? .................................................................Yes  No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions .................................................................Yes  No
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

Identifying number (see instructions)

41-0832480

1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes ☐ 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 ☐ No ☐

b Did the transferor remain in existence after the transfer? Yes ☐ No ☒

If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder

Identifying number


c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Yes ☐ No ☒

If not, list the name and employer identification number (EIN) of the parent corporation.

Name of parent corporation

EIN of parent corporation

THE COMMUNITY INVESTMENT GROUP

41-1765364

d Have basis adjustments under section 367(a)(4) been made? Yes ☐ No ☒

3 If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

a List the name and EIN of the transferor’s partnership.

Name of partnership

EIN of partnership

TYRANNEX ENERGY LTD

41-0832480

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 established securities market? Yes ☒ No ☐

Part II Transferee Foreign Corporation Information (see instructions)

4 Name of transferee (foreign corporation)

TYRANNEX ENERGY LTD

5a Identifying number, if any

5b Reference ID number (see instructions)

6 Address (including country)

1100A, 520-5TH AVE SW ALBERTA

CALGARY CA T2P 3R7 CANADA

7 Country code of country of incorporation or organization (see instructions)

CA

8 Foreign law characterization (see instructions)

CORPORATION

9 Is the transferee foreign corporation a controlled foreign corporation? Yes ☒ No ☐
### Part III Information Regarding Transfer of Property

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? 
- Yes [ ] 
- No [X] 

If “Yes,” skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>FOREIGN CURRENCY – CAD</td>
<td>2,029</td>
<td>2,029</td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? 
- Yes [ ] 
- No [X] 

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? 
- Yes [ ] 
- No [X] 

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? 
- Yes [ ] 
- No [X] 

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? 
- Yes [ ] 
- No [X] 

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 u $ 

13 Did the transferor transfer property described in section 367(d)(4)? 
- Yes [ ] 
- No [X] 

If “No,” skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Totals
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ................................................................. [ ] Yes [ ] No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ................................................................. [ ] Yes [ ] No

c 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) u $ .................................................................

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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before ______ % (b) After ______ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

a Gain recognition under section 904(f)(3) ................................................................. [ ] Yes [ ] No

b Gain recognition under section 904(f)(5)(F) ................................................................. [ ] Yes [ ] No

c Recapture under section 1503(d) ................................................................. [ ] Yes [ ] No

d Exchange gain under section 987 ................................................................. [ ] Yes [ ] No

19 Did this transfer result from a change in entity classification? ................................................................. [ ] Yes [ ] No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions

If “Yes,” complete lines 20b and 20c.

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ .................................................................

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? ................................................................. [ ] Yes [ ] No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions ................................................................. [ ] Yes [ ] No
Return by a U.S. Transferor of Property to a Foreign Corporation

Part I  U.S. Transferor Information (see instructions)

Name of transferor

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? Yes ☐ No ☑

2. If the transferor was a corporation, complete questions 2a through 2d.

   a. If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?

   b. Did the transferor remain in existence after the transfer?

   If not, list the controlling shareholder(s) and their identifying number(s).

   Controlling shareholder

   Identifying number

   c. If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?

   If not, list the name and employer identification number (EIN) of the parent corporation.

   Name of parent corporation

   EIN of parent corporation

   d. Have basis adjustments under section 367(a)(4) been made?

   If the transferor was a partner in a partnership that was the actual transferor (but is not treated as such under section 367), complete questions 3a through 3d.

   a. List the name and EIN of the transferor’s partnership.

   Name of partnership

   EIN of partnership

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets?

   c. Is the partner disposing of its entire interest in the partnership?

   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?

   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.

Part II  Transferee Foreign Corporation Information (see instructions)

4. Name of transferee (foreign corporation)

   **VESTA ENERGY CORP**

5a. Identifying number, if any

5b. Reference ID number (see instructions)

   **VESTA CORPORATION**

6. Address (including country)

   2200, 520–3RD AVENUE SW

   CALGARY, CA T2P 0R3 CANADA

7. Country code of country of incorporation or organization (see instructions)

   **CA**

8. Foreign law characterization (see instructions)

   **CORPORATION**

For Paperwork Reduction Act Notice, see separate instructions.
### Section A—Cash

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred?  
If "Yes," skip the remainder of Part III and go to Part IV.  

Yes [x] No

### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
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<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td>FOREIGN CURRENCY – CAD</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td></td>
<td>FOREIGN CURRENCY – CAD</td>
<td>1,845</td>
<td>1,845</td>
<td></td>
</tr>
<tr>
<td>Other property (not listed under another category)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Property with built-in loss

- Totals  
1,845 1,845

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  
Yes [x] No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  
Yes [x] No

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?  
Yes [x] No

c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  
Yes [x] No

d Enter the transferred loss amount included in gross income as required under section 91 u $  
13 Did the transferor transfer property described in section 367(d)(4)?  
Yes [x] No

### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>Type of property</th>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Totals

---

DAA
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
Yes □ No □

14b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
Yes □ No □

14c 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 □

14d 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) u $ __________.

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 □

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV  Additional Information Regarding Transfer of Property (see instructions)

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before _________ %  (b) After _________ %  IRC SECTION 351

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

a Gain recognition under section 904(f)(3)  
Yes □ No □

b Gain recognition under section 904(f)(5)(F)  
Yes □ No □

c Recapture under section 1503(d)  
Yes □ No □

d Exchange gain under section 987  
Yes □ No □

19 Did this transfer result from a change in entity classification?  
Yes □ No □

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
Yes □ No □

If “Yes,” complete lines 20b and 20c.

b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $ __________

c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
Yes □ No □

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
Yes □ No □
Form 926
(Return by a U.S. Transferor of Property to a Foreign Corporation)

Part I  U.S. Transferor Information (see instructions)

Name of transferor

MINNESOTA COMMUNITY FOUNDATION

41–0832480

1  Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? ☐ Yes ☑ No

2  If the transferee 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 ☑ No
   b  Did the transferor remain in existence after the transfer? ☐ Yes ☑ No

Controlling shareholder

Identifying number

Name of parent corporation

EIN of parent corporation

c  If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? ☐ Yes ☑ No

Name of parent corporation

EIN of parent corporation

d  Have basis adjustments under section 367(a)(4) been made? ☐ Yes ☑ No

3  If the transferee 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.

The name of partnership

EIN of partnership

b  Did the partner pick up its pro rata share of gain on the transfer of partnership assets? ☐ Yes ☑ No

c  Is the partner disposing of its entire interest in the partnership? ☐ Yes ☑ No

d  Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? ☐ Yes ☑ No

Part II  Transferee Foreign Corporation Information (see instructions)

4  Name of transferee (foreign corporation)

WATERTON MINING (LUXEMBOURG) S.A.R.L

5a  Identifying number, if any

5b  Reference ID number (see instructions)

Address (including country)

6 RUE EUGENE RUPPERT

LU L-2453 LUXEMBOURG

Country code of country of incorporation or organization (see instructions)

LU

7  Foreign law characterization (see instructions)

CORPORATION

8  For Paperwork Reduction Act Notice, see separate instructions.

For Paperwork Reduction Act Notice, see separate instructions.

DAA

Go to www.irs.gov/Form926 for instructions and the latest information.
### Part III Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 **Was cash the only property transferred?**

If "Yes," skip the remainder of Part III and go to Part IV.

---

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Fair market value on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td>12/31/18 STOCK</td>
<td>387</td>
<td>387</td>
<td></td>
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</tr>
<tr>
<td>Inventory</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other property</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(not listed under another category)</td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property with built-in loss</td>
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<tr>
<td>Totals</td>
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<td></td>
<td>387</td>
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</tbody>
</table>

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Type of property</th>
<th>(b) Date of transfer</th>
<th>(c) Description of property</th>
<th>(d) Useful life</th>
<th>(e) Arm's length price on date of transfer</th>
<th>(f) Cost or other basis</th>
<th>(g) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property described in sec. 367(d)(4)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Totals</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

11 **Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?**

If "Yes," go to line 12b.

12a **Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?**

If “Yes,” continue to line 12b.

12b **Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?**

If “Yes,” continue to line 12c. If “No,” skip lines 12c and 12d, and go to line 13.

12c **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.

12d **Enter the transferred loss amount included in gross income as required under section 91 u $**

If “No,” skip Section C and questions 14a through 15.

---

**Form 926 (Rev. 11-2018)**
14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? ☐ Yes ☐ No

b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? ☐ Yes ☐ No

c 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

**Supplemental Part III Information Required To Be Reported (see instructions)**

**Part IV Additional Information Regarding Transfer of Property (see instructions)**

16 Enter the transferor’s interest in the transferee foreign corporation before and after the transfer. (a) Before ______ % (b) After ______ %

17 Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18 Indicate whether any transfer reported in Part III is subject to any of the following.

| a | Gain recognition under section 904(f)(3) | ☐ Yes ☒ No |
| b | Gain recognition under section 904(f)(5)(F) | ☐ Yes ☒ No |
| c | Recapture under section 1503(d) | ☐ Yes ☒ No |
| d | Exchange gain under section 987 | ☐ Yes ☒ No |

19 Did this transfer result from a change in entity classification? ☐ Yes ☒ No

20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.

   If “Yes,” complete lines 20b and 20c.

   b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) $ ______________.

   c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? ☐ Yes ☐ No

21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions. ☐ Yes ☒ No
**Part I U.S. Transferor Information (see instructions)**

**Name of transferor**

<table>
<thead>
<tr>
<th>MINNESOTA COMMUNITY FOUNDATION</th>
<th>Identifying number (see instructions)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>41-0832480</td>
</tr>
</tbody>
</table>

1. Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? [ ] Yes [X] No

2. If the transferee 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? [ ] Yes [X] No

       If not, list the controlling shareholder(s) and their identifying number(s).

<table>
<thead>
<tr>
<th>Controlling shareholder</th>
<th>Identifying number</th>
</tr>
</thead>
</table>

   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.

<table>
<thead>
<tr>
<th>Name of parent corporation</th>
<th>EIN of parent corporation</th>
</tr>
</thead>
</table>

   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.

<table>
<thead>
<tr>
<th>Name of partnership</th>
<th>EIN of partnership</th>
</tr>
</thead>
</table>

   b. Did the partner pick up its pro rata share of gain on the transfer of partnership assets? [ ] Yes [X] No

   c. Is the partner disposing of its entire interest in the partnership? [ ] Yes [X] No

   d. Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? [ ] Yes [X] No

**Part II Transferee Foreign Corporation Information (see instructions)**

<table>
<thead>
<tr>
<th>Name of transferee (foreign corporation)</th>
<th>Identifying number, if any</th>
</tr>
</thead>
<tbody>
<tr>
<td>WLR/TRF HMNS SUPERHOLDCO LLC</td>
<td>66-0821466</td>
</tr>
</tbody>
</table>

4. Address (including country)

   2001 ROSS AVENUE, SUITE 3400  TEXAS

   DALLAS  75201

5a. Identifying number, if any

5b. Reference ID number (see instructions)

6. Country code of country of incorporation or organization (see instructions)

   MH

7. Foreign law characterization (see instructions)

   CORPORATION

8. Is the transferee foreign corporation a controlled foreign corporation? [ ] Yes [X] No

For Paperwork Reduction Act Notice, see separate instructions.
### Part III | Information Regarding Transfer of Property (see instructions)

#### Section A—Cash

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cash</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10 Was cash the only property transferred? ☐ Yes ☒ No

If "Yes," skip the remainder of Part III and go to Part IV.

#### Section B—Other Property (other than intangible property subject to section 367(d))

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Fair market value on date of transfer</th>
<th>(d) Cost or other basis</th>
<th>(e) Gain recognized on transfer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stock and securities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inventory</td>
<td>11/25/19 OTHER PROPERTY</td>
<td>3,013</td>
<td>3,013</td>
<td></td>
</tr>
</tbody>
</table>

Other property (not listed under another category)

Property with built-in loss

Totals 3,013 3,013

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? ☐ Yes ☒ No

12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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? ☐ Yes ☒ No

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 u $ ☐ Yes ☒ No

13 Did the transferor transfer property described in section 367(d)(4)? ☐ Yes ☒ No

If "No," skip Section C and questions 14a through 15.

#### Section C—Intangible Property Subject to Section 367(d)

<table>
<thead>
<tr>
<th>(a) Date of transfer</th>
<th>(b) Description of property</th>
<th>(c) Useful life</th>
<th>(d) Arm's length price on date of transfer</th>
<th>(e) Cost or other basis</th>
<th>(f) Income inclusion for year of transfer (see instructions)</th>
</tr>
</thead>
</table>

Property described in sec. 367(d)(4)

Totals
Part IV  Additional Information Regarding Transfer of Property (see instructions)

14a  Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  
Yes  No

b  At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  
Yes  No

c  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) u $  

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

Supplemental Part III Information Required To Be Reported (see instructions)

Part IV  Additional Information Regarding Transfer of Property (see instructions)

16  Enter the transferor’s interest in the transferee foreign corporation before and after the transfer.

(a) Before _________ %  (b) After _________ %

17  Type of nonrecognition transaction (see instructions) u IRC SECTION 351

18  Indicate whether any transfer reported in Part III is subject to any of the following.

a  Gain recognition under section 904(f)(3)  
Yes  No

b  Gain recognition under section 904(f)(5)(F)  
Yes  No

c  Recapture under section 1503(d)  
Yes  No

d  Exchange gain under section 987  
Yes  No

19  Did this transfer result from a change in entity classification?  
Yes  No

20a  Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions  
Yes  No

If “Yes,” complete lines 20b and 20c.

b  Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) u $  

20c  Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  
Yes  No

21  Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  
Yes  No
### Net Operating Loss Carryover Worksheet for Pre-2018 Losses

**Form 990-T**

For calendar year 2019, or tax year beginning _______ , ending _______

Name: MINNESOTA COMMUNITY FOUNDATION  
Employer Identification Number: 41-0832480

<table>
<thead>
<tr>
<th>Preceding Year</th>
<th>Adj. To NOL Inc/(Loss) After Adj.</th>
<th>NOL Utilized (Income Offset)</th>
<th>Carryovers to Current Year</th>
<th>Income Offset By Prior Carryover</th>
<th>Next Year Carryover</th>
</tr>
</thead>
<tbody>
<tr>
<td>15th</td>
<td>12/31/99</td>
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<tr>
<td>14th</td>
<td>12/31/00</td>
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<td>13th</td>
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</tr>
</tbody>
</table>

NOL carryover available to current year  

Current year  

| 0 | 0 | 0 | -1,000 |

NOL carryover available to next year  

2,903,167