## PUBLIC DISCLOSURE COPY

| EXEMPLY CRAINED SUBJECT TO THE STATE OF THE | •           | 000 T                         | E   | Exempt Organization  | Busin        | ess l     | Income Tax              | Retur                     | n           | C      | MB No. 1545       | -0687       |
|---|-------------|-------------------------------|---|--|--------------|-----------|-------------------------|---------------------------|-------------|--------|-------------------|-------------|
| Updatinant of the lineary interest Beneral Section (1) and the latest Information (1) and th | Form        | 1-066                         |   | (and proxy tax   | under        | section   | on 6033(e))             |                           |             |        |                   |             |
| December of the Treasor   |             |                               | For cale  | ndar year 2017 or other tax year begini  | ning         | , 20      | 017, and ending         | , 20                      |             |        |                   |             |
| Compared   Continued   Compared   Continued   Compared   Continued   Contin   | Departme    |                               |   |  |              |           |                         |                           |             | 0      | to Dublic lase    | andian fam  |
| B. Exempt under section   |             |                               | <b>▶</b> Do r   | ot enter SSN numbers on this form a  | is it may be | made p    | oublic if your organiza | tion is a 50 <sup>-</sup> | 1(c)(3).    | 501(c  | c)(3) Organizat   | tions Only  |
| B. Exempt under section   | A a         | heck box if<br>ddress changed |   | Name of organization ( Check box   | x if name ch | anged ar  | nd see instructions.)   |                           |             |        |                   |             |
| 20   20   20   20   20   20   20   20   |             |                               | Print   | THE MCKNIGHT FOUNDATION  |              |           |                         |                           | (Emp        | ioyees | s' trust, see ins | tructions.) |
|   | <b>∠</b> 50 | 1( C )( 3 )                   | or Number, street, and room or suite no. If a P.O. box, see instructions. |  |              |           |                         |                           |             |        |                   |             |
| George   Force   George   Force   George   Ge   | <u> </u>    | _                             | Туре  |  |              |           |                         |                           |             |        |                   | ity codes   |
| Continued   Special point     |             |                               |   |  | , and ZIP or | foreign p | postal code             |                           | ,           |        | !                 |             |
| Describe the organization by per   □ 501(c) corporation   501(c) trust   01(a) trust   0 ther trust   Describe the organization by primary unrelated business activity.   ► PARTNERSHIP INDESTINENT INCOME  | <u> </u>    | 9(a)                          |   | <u> </u>   |              |           |                         |                           | 52          | 3000   |                   |             |
| H Describe the organization's primary unrelated business activity. ▶ PARTINERSHIP INVESTMENT INCOME    During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group?   Ves   No If Yes,   Molecular the name and identifying number of the parent corporation. ▶   (612) 333-4220   | at end      | of year                       |   |  |              |           | 501(a) tru              | uot –                     | 1 401/6     | \ +r   | + 🗆 🗀             | or truct    |
| During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group?   ▶   |             |                               |   |  |              |           |                         |                           | <u> </u>    | trus   | st 🔝 Ott          | ier trust   |
| T **P*cs," enter the name and identifying number of the parent corporation. ►   |             |                               |   |  |              |           |                         |                           |             |        | N □ Voo           | No.         |
| The books are in care of ▶ THERESE CASEY   Telephone number ▶ (612) 333-4220  |             | •                             |   |  | •            | •         | •                       | Jilifolied g              | roup? .     | . ,    | □ res             | V NO        |
| Total Components   Color   Component   Color   Colo   |             |                               |   |  | arenii corp  | oration   |                         | ne numbe                  | r Þ         |        | (612) 333-4       | 220         |
| 1a  |             | _                             |   |  |              |           | •                       | I                         |             |        | , ,               |             |
| Descriptions and allowances   |             |                               |   |  |              |           | .,                      |                           |             |        | · , ,             |             |
| 2   |             | •                             |   |  | lance >      | 1c        | 0                       |                           |             |        |                   |             |
| 3   | 2           |                               |   |  |              | 2         | 0                       |                           |             |        |                   |             |
| b Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797) c Capital loss deduction for trusts lincome (loss) from parinerships and S corporations (attach statement) form (loss) from parinerships and S corporations (attach statement) form (loss) from parinerships and S corporations (attach statement) form (loss) from parinerships and S corporations (attach statement) form (loss) from parinerships and S corporations (schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule F) form (loss) from parinerships and S corporations (Schedule J) form (loss) from parinerships and S corporations (Schedule J) form (loss) from parinerships and S corporations (Schedule J) form (loss) from parinerships and S corporations (Schedule K) form (loss) from parinerships and S corporations (Schedule K) form (loss) from parinerships and parinerships | 3           | -                             |   | -  |              | 3         | 0                       |                           |             |        |                   | 0           |
| c Capital loss deduction for trusts         4c         0         0         0           5 Income (isos) from partnerships and S corporations (attach statement)         5 518,650         518,650         518,650           6 Rent income (Schedule C)         0         0         0         0           7 Unrelated debt-financed income (Schedule E)         7         0         0         0           8 Interest, annutiles, royalities, and rents from controlled organizations (Schedule F)         8         0         0         0           9 Investment income of a section 501(c)(7), 90, or (17) organization (Schedule G)         9         0         0         0         0           10 Exploited exempt activity income (Schedule J)         10         0         0         0         0           11 Advertising income (Schedule J)         11         0         0         0         0           12 Other income (See instructions; attach schedule)         12         0         0         0           12 Other income (See instructions; attach schedule)         12         0         0         2,562,055           Part III Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Except for contributions, difference)         14         0         0           15 Salaries and wages         15 <t< td=""><td>4a</td><td>Capital gain ne</td><td>et incon</td><td>ne (attach Schedule D)</td><td></td><td>4a</td><td>2,043,405</td><td></td><td></td><td></td><td>2,043,4</td><td>05</td></t<>   | 4a          | Capital gain ne               | et incon  | ne (attach Schedule D)   |              | 4a        | 2,043,405               |                           |             |        | 2,043,4           | 05          |
| Income (loss) from partnerships and S corporations (attach statement)   | b           | Net gain (loss)               | (Form 4   | 797, Part II, line 17) (attach Forn  | n 4797)      | 4b        | 0                       |                           |             |        |                   | 0           |
| Rent income (Schedule C)  | С           | Capital loss de               | eduction  | n for trusts   |              | 4c        | 0                       |                           |             |        |                   | 0           |
| The properties of the proper  | 5           | Income (loss) fro             | m partne  | erships and S corporations (attach st  | tatement)    | 5         | 518,650                 |                           |             |        | 518,6             | 50          |
| Interest, annuities, royalties, and rents from controlled organizations (Schedule F)   Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G)   9   | 6           | Rent income (                 | Schedu  | le C)  |              | 6         | 0                       |                           | 0           |        |                   | 0           |
| Part     | 7           | Unrelated deb                 | t-financ  | ed income (Schedule E)   |              | 7         | 0                       |                           | 0           |        |                   | 0           |
| Exploited exempt activity income (Schedule I)   | 8           | Interest, annuities,          | royalties,  | and rents from controlled organizations (S   | Schedule F)  | 8         | 0                       |                           | 0           |        |                   | 0           |
| 11  | 9           | Investment incom              | e of a sec  | tion 501(c)(7), (9), or (17) organization (S   | Schedule G)  | 9         | 0                       |                           | 0           |        |                   | 0           |
| 12  | 10          | -                             | -   | -  |              |           |                         |                           | 0           |        |                   | 0           |
| Total. Combine lines 3 through 12   13   2,562,055   0   2,562,055  |             | _                             | -   | *  |              |           |                         |                           | 0           | _      |                   |             |
| Part II Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Except for contributions, deductions must be directly connected with the unrelated business income.)  14 Compensation of officers, directors, and trustees (Schedule K)   |             | ,                             |   |  |              | -         |                         |                           |             |        |                   | <u> </u>    |
| A compensation of officers, directors, and trustees (Schedule K)   14   |             |                               |   |  |              | -         |                         | \ /=                      |             |        |                   | 55          |
| 14         Compensation of officers, directors, and trustees (Schedule K)         14         0           15         Salaries and wages         15         74,715           16         Repairs and maintenance         16         0           17         Bad debts         17         0           18         Interest (attach schedule)         18         0           19         Taxes and licenses         19         96,488           20         Charitable contributions (See instructions for limitation rules)         20         59,135           21         Depreciation (attach Form 4562)         21         0           22         Less depreciation claimed on Schedule A and elsewhere on return         22a         0         22b         0           23         Depletion         23         148,333         24         0         22b         0         0           25         Employee benefit programs         24         0         23         148,333         24         24         0         25         23,776         25         23,776         25         23,776         25         23,776         25         23,776         25         23,776         26         0         27         26         0         0   | Part        |                               |   | •  |              |           |                         | ns.) (Exc                 | ept for     | con    | tributions,       |             |
| 15         Salaries and wages         15         74,715           16         Repairs and maintenance         16         0           17         Bad debts         17         0           18         Interest (attach schedule)         18         0           19         Taxes and licenses         19         96,488           20         Charitable contributions (See instructions for limitation rules)         20         59,135           21         Depreciation (attach Form 4562)         21         0           22         Less depreciation claimed on Schedule A and elsewhere on return         22a         0         22b         0           23         Depletion         23         148,333         24         Contributions to deferred compensation plans         24         0           25         Employee benefit programs         24         0         25         23,776         25         23,776         26         26         0         27         26         27         0         27         0         27         0         27         0         27         0         28         1,626,389         29         2,028,836         30         31         1,626,389         29         2,028,836         30         30<   | 14          |                               |   |  |              |           |                         |                           |             | 4.4    |                   |             |
| 16         Repairs and maintenance         16         0           17         Bad debts         17         0           18         Interest (attach schedule)         18         0           19         Taxes and licenses         19         96,488           20         Charitable contributions (See instructions for limitation rules)         20         59,135           21         Depreciation (attach Form 4562)         21         0           22         Less depreciation claimed on Schedule A and elsewhere on return         22a         0         22b         0           23         Depletion         23         148,333         2         24         0         0           25         Employee benefit programs         24         0         2         24         0         0           25         Excess exempt expenses (Schedule I)         26         0         2         25         23,776         0         2         2         2         2         2         2         2         2         2         2         2         2         3,776         2         2         2         3,776         2         2         2         2,028,836         0         2         2         2   |             |                               |   |  |              |           |                         |                           |             | _      | 74.7              | 15          |
| 17       0         18       Interest (attach schedule)       18       0         19       Taxes and licenses       19       96,488         20       Charitable contributions (See instructions for limitation rules)       20       59,135         21       Depreciation (attach Form 4562)       21       0         22       Less depreciation claimed on Schedule A and elsewhere on return       22a       0       22b       0         23       148,333       24       Contributions to deferred compensation plans       24       0         25       Employee benefit programs       25       23,776         26       Excess exempt expenses (Schedule I)       26       0         27       Excess readership costs (Schedule J)       27       0         28       Other deductions (attach schedule)       27       0         29       Charitable contributions (attach Form 4562)       29       2,028,836         20       Total deductions. Add lines 14 through 28       29       2,028,836         29       Total deductions. Add lines 14 through 28       29       2,028,836         20       Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13       30       533,219         31 <td></td> <td></td> <td>•</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>_</td> <td>-</td> <td>14,1</td> <td>-</td>   |             |                               | •   |  |              |           |                         |                           | _           | -      | 14,1              | -           |
| 18         Interest (attach schedule)         18         0           19         Taxes and licenses         19         96,488           20         Charitable contributions (See instructions for limitation rules)         20         59,135           21         Depreciation (attach Form 4562)         21         0           22         Less depreciation claimed on Schedule A and elsewhere on return         22a         0         22b         0           23         Depletion         23         148,333         24         0         23         148,333         24           24         Contributions to deferred compensation plans         24         0         0         25         23,776         25         23,776         26         27         27         0         27         26         0         27         26         0         27         0         27         0         28         1,626,389         29         2,028,836         29         2,028,836         29         2,028,836         29         2,028,836         30         1         0         20         2,028,836         30         1         0         30         533,219         33         1         0         30         533,219         32         533,21   |             | •                             |   |  |              |           |                         |                           | _           | _      |                   |             |
| Taxes and licenses  |             |                               |   |  |              |           |                         |                           |             | -      |                   |             |
| 20         Charitable contributions (See instructions for limitation rules)         20         59,135           21         Depreciation (attach Form 4562)         21         0           22         Less depreciation claimed on Schedule A and elsewhere on return         22a         0         22b         0           23         Depletion         23         148,333         24         Contributions to deferred compensation plans         24         0           25         Employee benefit programs         25         23,776         25         23,776           26         Excess exempt expenses (Schedule I)         26         0           27         Excess readership costs (Schedule J)         27         0           28         Other deductions (attach schedule)         28         1,626,389           29         Total deductions. Add lines 14 through 28         29         2,028,836           30         Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13         30         533,219           31         Net operating loss deduction (limited to the amount on line 30)         31         0           32         Unrelated business taxable income before specific deduction. Subtract line 31 from line 30         32         533,219           33         1,000   |             | ·                             |   | · ·  |              |           |                         |                           |             | -      | 96,4              | 88          |
| 21         Depreciation (attach Form 4562)         21         0           22         Less depreciation claimed on Schedule A and elsewhere on return         22a         0         22b         0           23         Depletion         23         148,333         24         Contributions to deferred compensation plans         24         0           25         Employee benefit programs         25         23,776         25         23,776           26         Excess exempt expenses (Schedule I)         26         0           27         Excess readership costs (Schedule J)         27         0           28         Other deductions (attach schedule)         27         0           29         Cyoza,836           30         Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13         30         533,219           31         Net operating loss deduction (limited to the amount on line 30)         31         0           32         Unrelated business taxable income before specific deduction. Subtract line 31 from line 30         32         533,219           33         Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions)         33         1,000           34         Unrelated business taxable income. Subtract line 33 from line 32. If line 33 is  |             |                               |   |  |              |           |                         |                           |             | -      |                   |             |
| Depletion   | 21          |                               |   | -  | -            |           | 1 1                     |                           |             |        |                   |             |
| Contributions to deferred compensation plans  Employee benefit programs   | 22          | Less deprecia                 | tion clai   | med on Schedule A and elsewh   | nere on re   | turn .    | . 22a                   | 0                         | 2           | 2b     |                   | 0           |
| Employee benefit programs   | 23          | Depletion                     |   |  |              |           |                         |                           |             | 23     | 148,3             | 33          |
| Excess exempt expenses (Schedule I)   | 24          |                               |   | ·  |              |           |                         |                           |             | 24     |                   | 0           |
| 27 0  28 Other deductions (attach schedule)   |             |                               |   |  |              |           |                         |                           |             |        | 23,7              | 76          |
| Other deductions (attach schedule)  |             |                               | -   |  |              |           |                         |                           |             | -      |                   |             |
| Total deductions. Add lines 14 through 28   |             |                               | -   | The state of the s |              |           |                         |                           |             |        |                   |             |
| Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13  Net operating loss deduction (limited to the amount on line 30)   |             |                               | -   | *  |              |           |                         |                           |             | _      |                   |             |
| Net operating loss deduction (limited to the amount on line 30)   |             |                               |   |  |              |           |                         |                           | <del></del> |        |                   | _           |
| Unrelated business taxable income before specific deduction. Subtract line 31 from line 30  |             |                               |   |  |              |           |                         |                           |             | -      | 533,2             |             |
| Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions)   |             |                               |   |  |              |           |                         |                           |             | _      | F22.0             |             |
| 34 Unrelated business taxable income. Subtract line 33 from line 32. If line 33 is greater than line 32,  |             |                               |   | · · · · · · · · · · · · · · · · · · ·  |              |           |                         |                           |             | _      |                   |             |
|   |             |                               |   |  |              |           |                         |                           |             | 00     | 1,0               | -           |
|   |             |                               |   |  |              |           |                         |                           |             | 34     | 532.2             | 19          |

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 11291J

Form **990-T** (2017)

Form 990-T (2017)

|          | 0-1 (2017) |                      |                         |             |               |                 |                     |              |                       |          |                                  |               | raye <b>z</b> |
|----------|------------|----------------------|-------------------------|-------------|---------------|-----------------|---------------------|--------------|-----------------------|----------|----------------------------------|---------------|---------------|
| Part I   |            | ax Computati         |                         |             |               |                 |                     |              |                       |          |                                  |               |               |
| 35       |            |                      | le as Corporat          |             |               |                 |                     |              | Controlled grou       | up       |                                  |               |               |
|          | membe      | ers (sections 156    | 61 and 1563) ch         | eck he      | re 🕨 🗌        | See instru      | ı <b>ctions</b> and | d:           |                       |          |                                  |               |               |
| а        | Enter ye   | our share of the     | \$50,000, \$25,0        | 00, and     | \$9,925,      |                 |                     | ackets (     | in that order):       |          |                                  |               |               |
|          | (1) \$     |                      | (2) \$                  |             |               | (3)             | \$                  |              |                       |          |                                  |               |               |
| b        | Enter o    | rganization's sh     | are of: (1) Addit       | ional 5     | % tax (no     | ot more that    | n \$11,750)         | \$           |                       |          |                                  |               |               |
|          | (2) Add    | itional 3% tax (ı    | not more than \$        | 100,00      | 0)            |                 |                     | \$           |                       |          |                                  |               |               |
| С        | Income     | tax on the amo       | ount on line 34.        |             |               |                 |                     |              | 1                     | ▶        | 35c                              | 180,954       |               |
| 36       |            |                      | Trust Rates.            |             |               |                 |                     |              |                       | on       |                                  |               |               |
|          | the amo    | ount on line 34      | from: 🗌 Tax rat         | e sche      | dule or [     | Schedule        | e D (Form 1         | 1041) .      |                       | <b>▶</b> | 36                               |               |               |
| 37       | Proxy t    | ax. See instruc      | tions                   |             |               |                 |                     |              | 1                     | ▶        | 37                               |               |               |
| 38       | Alternat   | tive minimum ta      | ıx                      |             |               |                 |                     |              |                       |          | 38                               | 0             |               |
| 39       | Tax on     | Non-Complian         | nt Facility Incor       | ne. See     | e instruct    | ions            |                     |              |                       |          | 39                               |               |               |
| 40       | Total. A   | Add lines 37, 38     | and 39 to line 3        | 35c or 3    | 36, which     | ever applie     | s                   |              |                       | Ī        | 40                               | 180,954       |               |
| Part I   | V Ta       | ax and Payme         | ents                    |             |               |                 |                     |              |                       |          |                                  |               |               |
| 41a      | Foreign    | tax credit (corpo    | rations attach Fo       | rm 111      | 8; trusts a   | attach Form     | 1116) .             | 41a          |                       |          |                                  |               |               |
| b        | Other c    | redits (see instr    | uctions)                |             |               |                 |                     | 41b          |                       |          |                                  |               |               |
| С        | Genera     | l business cred      | it. Attach Form         | 3800 (s     | ee instru     | ctions)         |                     | 41c          | 1,371                 |          |                                  |               |               |
| d        | Credit f   | or prior year mi     | nimum tax (atta         | ch Forr     | n 8801 o      | r 8827) .     . |                     | 41d          |                       |          |                                  |               |               |
| е        | Total c    | redits. Add line     | s 41a through 4         | 1d .        |               |                 |                     |              |                       |          | 41e                              | 1,371         |               |
| 42       | Subtrac    | ct line 41e from     | line 40                 |             |               |                 |                     |              |                       |          | 42                               | 179,583       |               |
| 43       | Other tax  | xes. Check if from   | : Form 4255             | Form        | 8611 🔲 F      | orm 8697 🗌      | Form 8866 [         | Other (a     | attach schedule) .    | Ī        | 43                               | 0             |               |
| 44       | Total ta   | ax. Add lines 42     | and 43                  |             |               |                 |                     |              |                       |          | 44                               | 179,583       |               |
| 45a      | Paymer     | nts: A 2016 ove      | rpayment credit         | ed to 2     | 017 .         |                 |                     | 45a          | 570,483               | Ī        |                                  |               |               |
| b        |            |                      | yments                  |             |               |                 |                     | . 45b        | 0                     |          |                                  |               |               |
| С        | Tax dep    | oosited with For     | m 8868                  |             |               |                 |                     | 45c          |                       |          |                                  |               |               |
| d        | Foreign    | organizations:       | Tax paid or with        | nheld at    | t source      | (see instruc    | tions) .            | 45d          |                       |          |                                  |               |               |
| е        | Backup     | withholding (se      | ee instructions)        |             |               |                 |                     | 45e          |                       |          |                                  |               |               |
| f        | Credit f   | or small employ      | er health insura        | ince pr     | emiums (      | Attach Forr     | n 8941) .           | 45f          |                       |          |                                  |               |               |
| g        | Other c    | redits and payr      | nents:                  | Form 2      | 439           |                 | •                   |              |                       |          |                                  |               |               |
|          | ☐ Form     | า 4136               |                         | Other       |               | 0               | <br>Total ▶         | 45g          | 0                     |          |                                  |               |               |
| 46       | Total p    | ayments. Add         | lines 45a throug        | h 45g       |               |                 |                     |              |                       |          | 46                               | 570,483       |               |
| 47       | Estimat    | ted tax penalty      | see instructions        | ). Chec     | k if Form     | n 2220 is at    | ached .             |              |                       |          | 47                               |               |               |
| 48       | Tax du     | e. If line 46 is le  | ss than the tota        | l of line   | s 44 and      | 47, enter a     | mount owe           | ed           |                       | ▶ [      | 48                               | 0             |               |
| 49       | Overpa     | nyment. If line 4    | 6 is larger than        | the tota    | al of lines   | 44 and 47,      | enter amo           | unt over     | paid                  | ▶ [      | 49                               | 390,900       |               |
| 50       | Enter the  | amount of line 49    | you want: <b>Cred</b> i | ited to 2   | 018 estim     | ated tax 🕨      | 390                 | ,900         | Refunded              | ▶        | 50                               | 0             |               |
| Part '   | V St       | tatements Re         | garding Certa           | ain Ac      | tivities a    | and Other       | Informat            | ion (see     | instructions)         |          | ·                                |               |               |
| 51       | At any     | time during the      | 2017 calendar y         | /ear, di    | d the org     | anization h     | ave an inte         | rest in o    | r a signature d       | or oth   | her author                       | ity Yes       | No            |
|          | over a     | financial accou      | nt (bank, securit       | ies, or     | other) in     | a foreign c     | ountry? If          | YES, the     | e organization        | may      | have to                          | ile           |               |
|          | FinCEN     | l Form 114, Re       | port of Foreign         | Bank a      | nd Finan      | cial Accour     | nts. If YES,        | enter th     | ne name of the        | e for    | eign coun                        | try           |               |
|          | here ►     |                      |                         |             |               |                 |                     |              |                       |          |                                  |               | ~             |
| 52       | During t   | he tax year, did tl  | ne organization re      | ceive a     | distributio   | n from, or w    | as it the grar      | ntor of, o   | r transferor to, a    | fore     | ign trust?                       |               | ~             |
|          | If YES,    | see instructions     | for other forms         | the or      | ganizatio     | n may have      | to file.            |              |                       |          |                                  |               |               |
| 53       | Enter th   | ne amount of ta      | x-exempt intere         | st recei    | ived or a     | ccrued duri     | ng the tax y        | year ▶       | \$                    |          |                                  | 0             |               |
| <u> </u> |            |                      | declare that I have e   |             |               |                 |                     |              |                       |          | t of my knowl                    | edge and be   | lief, it is   |
| Sign     | <b>N</b>   | oneci, and complete. | Declaration of prepare  | e (other tr | ıarı taxpayer | is based on all | IIIIOIIIIALION OF   | willcri prep | arer rias arīy KNOWI6 | uye.     | May the IRS                      |               |               |
| Here     |            |                      |                         |             |               |                 | VP OF FIN           | IANCE        |                       |          | with the pre<br>(see instruction |               |               |
|          | Signat     | ure of officer       |                         |             | Dat           | е               | Title               |              |                       | I        | (See Histricti                   | Janaja 🗾 i es | I             |
| Paid     |            | Print/Type prepare   | r's name                |             | Preparer's    | signature       | · .                 |              | Date                  | Che      | eck if                           | PTIN          |               |
| Prepa    | arer       | NICOLE BENCIP        | <u> </u>                |             | Mu            | u XV            | rul                 |              | 11/14/2018            | 1        | -employed                        | P00756        | 3195          |
| Use (    |            | Firm's name ▶        | CROWE LLP               |             |               |                 |                     |              |                       | Firm     | ı's EIN ►                        | 35-09216      | 80            |
| USE (    | וווע       | Firm's address ►     | 225 WEST WAC            | KER DI      | RIVE, SUI     | TE 2600, CH     | ICAGO, IL 6         | 0606-122     | 24                    | Pho      | ne no. (                         | 312) 899-7    | 000           |

Form **990-T** (2017)

(Rev. January 2017)

Department of the Treasury Internal Revenue Service

#### **Application for Automatic Extension of Time To File an Exempt Organization Return**

► File a separate application for each return. ▶ Information about Form 8868 and its instructions is at www.irs.gov/form8868. OMB No. 1545-1709

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit

#### Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/efile, click on Charities & Non-Profits, and click on e-file for Charities and Non-Profits. Automatic 6-Month Extension of Time. Only submit original (no copies needed). All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns. Enter filer's identifying number, see instructions Name of exempt organization or other filer, see instructions. Employer identification number (EIN) or Type or THE MCKNIGHT FOUNDATION 41-0754835 print Number, street, and room or suite no. If a P.O. box, see instructions. Social security number (SSN) File by the 710 SECOND STREET SOUTH, 400 due date for filing your City, town or post office, state, and ZIP code. For a foreign address, see instructions. return. See MINNEAPOLIS, MN 55401 instructions. 0 7 Enter the Return Code for the return that this application is for (file a separate application for each return) . . . . . . . . . . . Return **Application Application** Return Is For Code Is For Code Form 990 or Form 990-EZ 01 Form 990-T (corporation) 07 Form 990-BL 02 Form 1041-A 80 Form 4720 (individual) 03 Form 4720 (other than individual) 09 Form 990-PF 04 Form 5227 10 Form 990-T (sec. 401(a) or 408(a) trust) 05 Form 6069 11 Form 990-T (trust other than above) Form 8870 12 The books are in the care of ► RICK SCOTT (612) 333-4220 Telephone No. ▶ Fax No. ▶ • If the organization does not have an office or place of business in the United States, check this box . . . . . . . . . . . . . . . . • If this is for a Group Return, enter the organization's four digit Group Exemption Number (GEN) . If this is for the whole group, check this box . . . ▶ □ . If it is for part of the group, check this box . . . . ▶ □ and attach a list with the names and EINs of all members the extension is for. for the organization named above. The extension is for the organization's return for: ► ✓ calendar year 20 17 or ▶ ☐ tax year beginning \_\_\_\_\_\_, 20 \_\_\_\_\_, and ending \_\_\_\_\_\_, 20 \_\_\_\_. If the tax year entered in line 1 is for less than 12 months, check reason: $\Box$ Initial return $\Box$ Final return Change in accounting period If this application is for Forms 990-BL, 990-PF, 990-T, 4720, or 6069, enter the tentative tax, less any nonrefundable credits. See instructions. 3a \$ 567,648 If this application is for Forms 990-PF, 990-T, 4720, or 6069, enter any refundable credits and estimated tax payments made. Include any prior year overpayment allowed as a credit. 3b \$ 567.648 c Balance due. Subtract line 3b from line 3a. Include your payment with this form, if required, by using EFTPS (Electronic Federal Tax Payment System). See instructions. 3с 0 Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-EO and Form 8879-EO for payment instructions.

For Privacy Act and Paperwork Reduction Act Notice, see instructions.

Cat. No. 27916D

Form **8868** (Rev. 1-2017)

Form 990-T (2017) Page **3** 

| Form 9  | 90-1 (2017)  |                    |   |            |         |                            |  |   |  |  | Page 3 |
|---|--|--------------------|---|------------|---------|----------------------------|--|---|--|--|--------|
| Sche  | dule A—Cost of Goods Sol   | <b>d.</b> En       | ter method of i   | nventoi    | y va    | aluation <b>&gt;</b>       |  |   |  |  |        |
| 1   | Inventory at beginning of year   |                    | 1 (   | )          | 6       | Inventory a                | at e   | end of year   | 6  | (  | )      |
| 2   | Purchases  |                    | 2 (   | )          | 7       | Cost of                    | go   | ods sold. Subtract  |  |  |        |
| 3   | Cost of labor  |                    | 3 (   | )          |         | line 6 from                | n li   | ne 5. Enter here and  |  |  |        |
| 4a  | Additional section 263A cos  | ts                 |   |            |         | in Part I, Iir             | ne   | 2   | 7  |  |        |
|   | (attach schedule)  | 4                  | la (  |            | 8       | Do the rul                 | les  | of section 263A (with   | n res  | pect to Yes  | No     |
| b   | Other costs (attach schedule)  | 4                  | lb (  | 0          |         | property p                 | ro   | duced or acquired for   | resale   | e) apply   |        |
| 5   | <b>Total.</b> Add lines 1 through 4b   |                    | 5 (   | )          |         | to the orga                | ani  | zation?   |  |  | ~      |
| Sche  | dule C-Rent Income (Fron   | n Rea              | al Property and   | d Perso    | onal    |                            |  |   |  |  |        |
| (see  | e instructions)  |                    |   |            |         |                            |  |   |  |  |        |
| 1. Desc   | ription of property  |                    |   |            |         |                            |  |   |  |  |        |
| (1)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (2)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (3)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (4)   |  |                    |   |            |         |                            |  |   |  |  |        |
|   | <b>2.</b> Rent   | receive            | ed or accrued   |            |         |                            |  |   |  |  |        |
| for personal property is more than 10% but not percentage of re |  |                    | (b) From real a percentage of rent 50% or if the rent             | for persor | nal pro | operty exceeds             |  | <b>3(a)</b> Deductions directly in columns 2(a) and                           |  |  | me     |
| (1)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (2)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (3)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (4)   |  |                    |   |            |         |                            |  |   |  |  |        |
| Total   |  | 0                  | Total   |            |         |                            | 0  |   |  |  |        |
| (c) Tot   | tal income. Add totals of columns 2<br>nd on page 1, Part I, line 6, column (<br>dule E—Unrelated Debt-Fir | ?(a) and<br>(A) .  | d 2(b). Enter<br>▶  | inetruo    | tions   |                            | 0  | (b) Total deductions.<br>Enter here and on page<br>Part I, line 6, column (B) |  |  | 0      |
| Scrie   | dule L—Officiated Debt-Fil   | iance              | ed income (see  |            |         | •                          | Τ  | 3. Deductions directly con  | nected   | with or allocable  | to     |
|   | 1. Description of debt-finance   | ed prop            | ertv  |            |         | come from or debt-financed | L  | debt-financ   |  |  |        |
|   | '  |                    | •   | property   |         | (                          | (a) Straight line depreciation (attach schedule) |   | <ul><li>b) Other deduction</li><li>(attach schedule)</li></ul> |  |        |
| (1)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (2)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (3)   |  |                    |   |            |         |                            |  |   |  |  |        |
| (4)   |  |                    |   |            |         |                            |  |   |  |  |        |
|   | acquisition debt on or   | of or<br>lebt-fina | e adjusted basis<br>allocable to<br>anced property<br>h schedule) |            | 4 di    | olumn<br>vided<br>Ilumn 5  |  | 7. Gross income reportable (column 2 × column 6)                              | ı  | Allocable deduct<br>mn 6 × total of co<br>3(a) and 3(b)) |        |
| (1)   |  |                    |   |            |         | %                          |  |   |  |  |        |
| (2)   |  |                    |   |            |         | %                          |  |   |  |  |        |
| (3)   |  |                    |   |            |         | %                          |  |   |  |  |        |
| (4)   |  |                    |   |            |         | %                          |  |   |  |  |        |
|   |  |                    |   | •          |         |                            |  | nter here and on page 1,<br>Part I, line 7, column (A).                       | ı  | r here and on p<br>t I, line 7, colum                    | 9 /    |
| Totals  |  |                    |   |            |         |                            |  | 0   |  |  | 0      |
| Total o   | dividends-received deductions inc  | luded              | in column 8 .   |            |         |                            |  |   |  |  | 0      |

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| Schedule F-Interest, Annuities, Royalties, and Rents From Controlled Organizations (see instructions) |   |   |   |  |  |   |   |   |  |
|---|---|---|---|--|--|---|---|---|--|
|   |   | Exempt  | Controlled                                    | d Organizations  |  |   |   |   |  |
| Name of controlled<br>organization  | 2. Employer identification number           |   | ated income<br>instructions)                  | 4. Total of specified payments made  | included in the o  | 5. Part of column 4 that is included in the controlling organization's gross income |   | 6. Deductions directly connected with income in column 5  |  |
| (1)   |   |   |   |  |  |   |   |   |  |
| (2)   |   |   |   |  |  |   |   |   |  |
| (3)   |   |   |   |  |  |   |   |   |  |
| (4)   |   |   |   |  |  |   |   |   |  |
| Nonexempt Controlled Organiz  | zations                                     | 1   |   |  | -  |   | '   |   |  |
| 7. Taxable Income   | 8. Net unrelated in (loss) (see instruct    | 1   |   | otal of specified<br>yments made   | 10. Part of column included in the coorganization's grounds.                 | ontrolling  | connec  | eductions directly<br>cted with income in<br>column 10  |  |
| (1)   |   |   |   |  |  |   |   |   |  |
| (2)   |   |   |   |  |  |   |   |   |  |
| (3)   |   |   |   |  |  |   |   |   |  |
| (4)   |   |   |   |  |  |   |   |   |  |
| Add columns 5 and 10. Add column Enter here and on page 1, Enter here and                             |   |   |   |  |  |   | columns 6 and 11.<br>here and on page 1,<br>line 8, column (B). |   |  |
| Totals  |   |   |   |  | <b>&gt;</b>  | (   |   | 0   |  |
| Schedule G-Investment I   | income of a Sect                            | tion 501(   |   | or (17) Organi Deductions  | ,  |   |   | otal deductions   |  |
| 1. Description of income  | 2. Amount o                                 | f income  | dire  | directly connected (attach schedule)   |  | 4. Set-asides (attach schedule)   |   | and set-asides (col. 3<br>plus col. 4)  |  |
| (1)   |   |   |   |  |  |   |   |   |  |
| (2)   |   |   |   |  |  |   |   |   |  |
| (3)   |   |   |   |  |  |   |   |   |  |
| (4)   |   |   |   |  |  |   |   |   |  |
| Totals  | Enter here and Part I, line 9, o            |   |   |  |  |   |   | re and on page 1,<br>ne 9, column (B).  |  |
| Schedule I—Exploited Exe  | empt Activity Inc                           |   |   | Advertising In   | come (see inst   | ructions  | 3)  |   |  |
| Description of exploited activity   | 2. Gross unrelated                          | 3. Expenses directly connected with production of |   | 4. Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7. | 5. Gross income<br>from activity that<br>is not unrelated<br>business income | 6. Expenses attributable to column 5  |   | 7. Excess exempt<br>expenses<br>(column 6 minus<br>column 5, but not<br>more than<br>column 4). |  |
| (1)   |   |   |   |  |  |   |   |   |  |
| (2)   |   |   |   |  |  |   |   |   |  |
| (3)   |   |   |   |  |  |   |   |   |  |
| (4)   |   |   |   |  |  |   |   |   |  |
| Totals  | Enter here and page 1, Part line 10, col. ( | :I, page  | here and on<br>e 1, Part I,<br>I 0, col. (B). |  |  |   |   | Enter here and<br>on page 1,<br>Part II, line 26.   |  |
| Schedule J-Advertising I  | ncome (see instru                           | ctions)   |   |  |  |   |   |   |  |
| Part I Income From P  | eriodicals Repor                            | ted on a  | Consoli                                       | dated Basis  |  |   |   |   |  |
| 1. Name of periodical   | 2. Gross<br>advertising<br>income           |   | . Direct<br>tising costs                      | 4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.                             | 5. Circulation income  | I   | dership<br>ests   | 7. Excess readership costs (column 6 minus column 5, but not more than column 4).               |  |
| (1)   |   |   |   |  |  |   |   |   |  |
| (2)   |   |   |   |  |  |   |   |   |  |
| (3)   |   |   |   |  |  |   |   |   |  |
| (4)   |   |   |   |  |  |   |   |   |  |
| Totals (carry to Part II, line (5)) .   | . ▶   | 0   | 0   | 0  | 0  |   | 0   | 0   |  |

Form 990-T (2017)

Part II Income From Periodicals Reported on a Separate Basis (For each periodical listed in Part II, fill in columns 2 through 7 on a line-by-line basis.)

| 1. Name of periodical   | 2. Gross<br>advertising<br>income                          | 3. Direct advertising costs                          | 4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7. | 5. Circulation income | 6. Readership costs | 7. Excess readership costs (column 6 minus column 5, but not more than column 4). |  |  |  |
|---|--|--|--|-----------------------|---------------------|---|--|--|--|
| (1)   |  |  |  |                       |                     |   |  |  |  |
| (2)   |  |  |  |                       |                     |   |  |  |  |
| (3)   |  |  |  |                       |                     |   |  |  |  |
| (4)   |  |  |  |                       |                     |   |  |  |  |
| Totals from Part I  | 0  | 0  |  |                       |                     | 0   |  |  |  |
|   | Enter here and on<br>page 1, Part I,<br>line 11, col. (A). | Enter here and on page 1, Part I, line 11, col. (B). |  |                       |                     | Enter here and<br>on page 1,<br>Part II, line 27.                                 |  |  |  |
| <b>Totals,</b> Part II (lines 1−5)  | 0  | 0  |  |                       |                     | 0   |  |  |  |
| Schedule K—Compensation of Officers Directors and Trustees (see instructions) |  |  |  |                       |                     |   |  |  |  |

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

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

Form **990-T** (2017)

| Name of Partnership  | EIN                      | UBI      |
|--|--------------------------|----------|
| AIM Activity   | LIIV                     | ODI      |
| (1) Apollo Global Management, LLC  | 20-8880053               | 259      |
| (2) COMMONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP                             | 20-8306365               | 8,208    |
| (3) COMMONFUND CAPITAL NATURAL RESOURCE PARTNERS VII, LP                         | 51-0605779               | 56,394   |
| (4) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS IX, LP                            | 36-4778201               | 14,280   |
| (5) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS V, LP                             | 06-1605326               | 14,307   |
| (6) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VI, LP                            | 16-1720029               | 32,561   |
| (7) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP                           | 20-8306306               | -16,302  |
| (8) COMMONFUND CAPITAL VENTURE PARTNERS IX, LP                                   | 26-4138517               | -1,297   |
| (9) COMMONFUND CAPITAL VENTURE PARTNERS VI, LP                                   | 06-1605325               | -5,642   |
| (10) COMMONFUND CAPITAL VENTURE PARTNERS VII, LP                                 | 16-1720044               | 2,261    |
| (11) COMMONFUND CAPITAL VENTURE PARTNERS VIII, LP                                | 11-3814030               | 2,147    |
| (12) COMMONFUND CAPITAL VENTURE PARTNERS X, LP                                   | 80-0788864               | -4,985   |
| (13) COMMONFUND CAPITAL VENTURE PARTNERS XI                                      | 47-2004432               | -136     |
| (14) DOVER STREET VII L.P.   | 74-3234906               | -51      |
| (15) Enterprise Products Partners L.P.   | 76-0568219               | -319,223 |
| (16) GREAT HILL EQUITY PARTNERS VI, LP   | 81-5105538               | 30       |
| (17) HARBOURVEST INTERNATIONAL EQUITY PARTNERS VI-PARTNERSHIP FUND L.P.          | 30-0486792               | 4,623    |
| (18) HARBOURVEST INTERNATIONAL PRIVATE EQUITY PARTNERS V - PARTNERSHIP FUND L.P. | 05-0623924               | -1,155   |
| (19) HARBOURVEST PARTNERS VI - PARTNERSHIP FUND, L.P.                            | 04-3464304               | -1,125   |
| (20) HARBOURVEST PARTNERS VI-BUYOUT PARTNERSHIP FUND L.P.                        | 04-3464306               | -7,675   |
| (21) HARBOURVEST PARTNERS VII - 2005 BUYOUT PARTNERSHIP FUND L.P.                | 52-2459514               | 47,931   |
| (22) HARBOURVEST PARTNERS VII - MEZZANINE AND DISTRESSED DEBT FUND L.P.          | 54-2082888               | 13,340   |
| (23) HARBOURVEST PARTNERS VII - VENTURE PARTNERSHIP FUND L.P.                    | 01-0682079               | -728     |
| (24) HARBOURVEST PARTNERS VII BUYOUT PARTNERSHIP FUND L.P.                       | 04-3699017               | 5,925    |
| (25) HARBOURVEST PARTNERS VIII - BUYOUT FUND L.P.                                | 34-2063501               | 229,954  |
| (26) HARBOURVEST PARTNERS VIII-VENTURE FUND L.P.                                 | 34-2063502               | -3,916   |
| (27) NORTHSKY CLEAN GROWTH FUND IV, LP   | 30-0946467               | 1,145    |
| (28) OAKTREE CAPITAL GROUP, LLC  | 26-0174894               | 500      |
| (29) OAKTREE PRINCIPAL FUND V AIF (DELAWARE), L.P.                               | 27-2860708               | 183,815  |
| (30) PANTHEON ACCESS (US), IP - INVESTOR SERIES 6                                | 81-4972182               | 1,669    |
| (31) PANTHEON ASIA FUND VI, LP   | 27-4186418               | 5,817    |
| (32) PANTHEON EUROPE FUND VI, LP   | 98-0573774               | -816     |
| (33) PANTHEON GLOBAL SECONDARY FUND IV, LP                                       | 26-3872534               | 26,522   |
| (34) PANTHEON GLOBAL SECONDARY FUND V, LP  | 80-0966179               | 32,451   |
| (35) PANTHEON MULTI-STRATEGY PROGRAM 2014 (US) LP - INVESTOR<br>SERIES 5         | 47-0754835               | -4,315   |
| (36) PANTHEON USA FUND IX, LP  | 27-4846111               | -6,819   |
| (37) PANTHEON USA FUND VII, LP   | 20-4787675               | 119,091  |
| (38) PANTHEON USA FUND VIII, LP  | 26-1269055               | 71,714   |
| (39) True Green Capital Fund III LP c/o True Green Capital Management LLC        | 81-1314940               | 43,879   |
| (40) VINTAGE IV, LP  | 20-8254632               | 44,831   |
| (41) WAYZATA OPPORTUNITIES FUND III, LP  | 26-4597364               | -70,819  |
|  | Total for Part I, Line 5 | 518,650  |

#### Form 990T Part II, Line 19

Taxes and Licenses

| Description               | Amount                    |
|---------------------------|---------------------------|
| AIM Activity              |                           |
| (1) Foreign Tax Deduction | 24,338                    |
| Other Activity            |                           |
| (2) State Taxes           | 72,150                    |
| Total fo                  | r Part II, Line 19 96,488 |

#### Form 990T Part II, Line 20

Charitable Contributions

| Year Generated | Amount Generated | Amount Used in Prior<br>Years | Amount Used in<br>Current Year | Amount Converted to NOL | Amount Remaining | Contribution Carryover Expires |
|----------------|------------------|-------------------------------|--------------------------------|-------------------------|------------------|--------------------------------|
| 2012           | 1,129            |                               | 0                              |                         | 1,129            | 2017                           |
| 2013           | 1,419            |                               | 0                              |                         | 1,419            | 2018                           |
| 2014           | 578              | 578                           | 0                              |                         | 0                | 2019                           |
| 2015           | 101,272          | 99,964                        | 0                              |                         | 1,308            | 2020                           |
| 2016           | 142,384          | 22,436                        | 0                              |                         | 119,948          | 2021                           |
| 2017           | 58,699,452       |                               | 59,127                         |                         | 58,640,325       | 2022                           |
| Totals         | 58,946,234       | 122,978                       | 59,127                         | 0                       | 58,764,129       |                                |

| Description  | Amount    |
|--|-----------|
| AIM Activity   |           |
| (1) Apollo Global Management, LLC 208880053  | 213       |
| (2) COMMONFUND CAPITAL INTERNATIONAL PARTNERS V, LP 161720038                              | 218       |
| (3) COMMONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP 208306365                             | 1,840     |
| (4) COMMONFUND CAPITAL NATURAL RESOURCE PARTNERS VII, LP 510605779                         | 70,473    |
| (5) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS IX, LP 364778201                            | 62,578    |
| (6) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS V, LP 061605326                             | 160       |
| (7) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VI, LP 161720029                            | 24,411    |
| (8) COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP 208306306                           | 74,720    |
| (9) COMMONFUND CAPITAL VENTURE PARTNERS IX, LP 264138517                                   | 3,410     |
| (10) COMMONFUND CAPITAL VENTURE PARTNERS VIII, LP 113814030                                | 120       |
| (11) COMMONFUND CAPITAL VENTURE PARTNERS X, LP 800788864                                   | 4,976     |
| (12) COMMONFUND CAPITAL VENTURE PARTNERS XI 472004432                                      | 40,473    |
| (13) DOVER STREET VII L.P. 743234906   | 1,686     |
| (14) HARBOURVEST INTERNATIONAL EQUITY PARTNERS VI-PARTNERSHIP FUND L.P. 300486792          | 49,443    |
| (15) HARBOURVEST INTERNATIONAL PRIVATE EQUITY PARTNERS V - PARTNERSHIP FUND L.P. 050623924 | 5,485     |
| (16) HARBOURVEST PARTNERS VI - PARTNERSHIP FUND, L.P. 043464304                            | 37        |
| (17) HARBOURVEST PARTNERS VII - 2005 BUYOUT PARTNERSHIP FUND L.P. 522459514                | 44,243    |
| (18) HARBOURVEST PARTNERS VII - MEZZANINE AND DISTRESSED DEBT FUND L.P. 542082888          | 7,039     |
| (19) HARBOURVEST PARTNERS VII - VENTURE PARTNERSHIP FUND L.P. 010682079                    | 4,986     |
| (20) HARBOURVEST PARTNERS VII BUYOUT PARTNERSHIP FUND L.P. 043699017                       | 3,718     |
| (21) HARBOURVEST PARTNERS VIII - BUYOUT FUND L.P. 342063501                                | 43,650    |
| (22) HARBOURVEST PARTNERS VIII-VENTURE FUND L.P. 342063502                                 | 1,561     |
| (23) NORTHSKY CLEAN GROWTH FUND IV, LP 300946467   | 14,419    |
| (24) OAKTREE PRINCIPAL FUND V AIF (DELAWARE), L.P. 272860708                               | 182,374   |
| (25) PANTHEON ACCESS (US), IP - INVESTOR SERIES 6 814972182                                | 8,736     |
| (26) PANTHEON ASIA FUND VI, LP 274186418   | -1,126    |
| (27) PANTHEON EUROPE FUND VI, LP 980573774   | 255       |
| (28) PANTHEON GLOBAL SECONDARY FUND IV, LP 263872534                                       | 19,120    |
| (29) PANTHEON GLOBAL SECONDARY FUND V, LP 800966179  | 217,928   |
| (30) PANTHEON MULTI-STRATEGY PROGRAM 2014 (US) LP - INVESTOR SERIES 5 470754835            | 11,604    |
| (31) PANTHEON USA FUND IX, LP 274846111  | 54,106    |
| (32) PANTHEON USA FUND VII, LP 204787675   | 14,048    |
| (33) PANTHEON USA FUND VIII, LP 261269055  | 20,191    |
| (34) VINTAGE IV, LP 208254632  | 56,808    |
| (35) WAYZATA OPPORTUNITIES FUND III, LP 264597364  | 13,038    |
| Total  | 1,056,941 |
| Other Activity   |           |
| (36) Professional Fees   | 27,359    |
| (37) Legal Fees  | 7,505     |
| (38) Portfolio Management Fees   | 386,271   |
| (39) Consulting Fees   | 138,585   |
| (40) Occupancy Expenses  | 850       |
| (41) Travel Expenses   | 8,457     |
| (42) Other Expenses  | 421       |
| Total  | 569,448   |
| Total for Part II, Line 28   | 1,626,389 |

# Form 3800

#### **General Business Credit**

▶ Go to www.irs.gov/Form3800 for instructions and the latest information.
 ▶ You must attach all pages of Form 3800, pages 1, 2, and 3, to your tax return.

OMB No. 1545-0895

2017

Attachment
Seguence No. 22

Internal Revenue Service (99)

Name(s) shown on return

THE MCKNIGHT FOUNDATION

Identifying number 41-0754835

| 1   698.00  | Part I  | Current Year Credit for Credits Not Allowed Against Tentative Minimum Tax (TMT (See instructions and complete Part(s) III before Parts I and II) | )   |                  |
|---|---------|--|-----|------------------|
| 2 Passive activity credits from line 2 of all Parts III with box B checked 2 3 Enter the applicable passive activity credits allowed for 2017. See instructions   | 1       | General business credit from line 2 of all Parts III with box A checked  | 1   | 698.00           |
| 4 Carryforward of general business credit to 2017. Enter the amount from line 2 of Part III with box C checked. See instructions for statement to attach  Carryback of general business credit from 2018. Enter the amount from line 2 of Part III with box D checked. See instructions  6 Add lines 1, 3, 4, and 5.  7 Regular tax before credits:  • Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the sum of the amounts from Form 1040NR, lines 42 and 44.  • Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return  • Estates and trusts. Enter the amount from Form 6251, line 35.  • Corporations. Enter the amount from Form 6251, line 35.  • Corporations. Enter the amount from Schedule I (Form 1041), line 56.  9 Add lines 7 and 8.  10a  10a Foreign tax credit  b Certain allowable credits (see instructions).  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  12 Net regular tax. Subtract line 10c from line 9. If zero reless, enter -0-  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  14 Tentative minimum tax  • Individuals. Enter the amount from Form 4626, line 12.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54.  15 Enter the greater of line 13 or line 14.  5 Lines 15 Lines 25.  15 Enter the smaller of line 15 or line 14.  15 Lines 25.  16 79,228.00  17 G98.00  C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reganization.  | 2       |  |     |                  |
| box C checked. See instructions for statement to attach 5 Carryback of general business credit from 2018. Enter the amount from line 2 of Part III with box D checked. See instructions 6 Add lines 1, 3, 4, and 5 7 Regular tax before credits 9 Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the sum of the amounts from Form 1040NR, lines 42 and 44 9 Corporations. Enter the amount from Form 1040NR, lines 42 and 44 9 Corporations. Enter the amount from Form 1040NR, lines 42 and 44 9 Corporations. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from Form 1041, Schedule G, lines 1a and 1b; or the amount from Form 4268, line 14 9 Estates and trusts. Enter the amount from Form 4268, line 14 9 Estates and trusts. Enter the amount from Form 4268, line 14 9 Corporations. Enter the amount from Form 4268, line 14 9 Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56 9 Add lines 7 and 8 9 180,180.00  10a Foreign tax credit b Certain allowable credits (see instructions) c Add lines 10a and 10b 11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0 on line 16 12 Net regular tax. Subtract line 10c from line 9. If zero or less, enter -0 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions). 14 Tentative minimum tax 15 Individuals. Enter the amount from Form 4254, line 12 16 Corporations. Enter the amount from Schedule I (Form 1041), line 54 17 Geys. 00 18 Subtract line 15 from line 11. If zero or less, enter -0 19 Enter the greater of line 13 or line 14 10 (Form 1041), line 54 11 Individuals. Enter the amount from Form 4258, line 12 15 Enter the smaller of line 6 or line 16 17 Geys. 00 17 Enter the smaller of line 6 or line 16 17 Geys. 00 17 Geys. 00 18 Subtract line 15 from line 11. If zero or less, enter -0 19 Corporations. See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   | 3       | Enter the applicable passive activity credits allowed for 2017. See instructions   | 3   |                  |
| 5 Carryback of general business credit from 2018. Enter the amount from line 2 of Part III with box D checked. See instructions 6 Add lines 1, 3, 4, and 5 6 Add lines 1, 3, 4, and 5 6 6 698.00  Part II Allowable Credit 7 Regular tax before credits • Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the sum of the amounts from Form 1040NR, lines 42 and 44 • Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return • Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return 8 Alternative minimum tax: • Individuals. Enter the amount from Form 6251, line 35 • Corporations. Enter the amount from Schedule I (Form 1041), line 56 9 Add lines 7 and 8  10a Foreign tax credit b Certain allowable credits (see instructions) c Add lines 10a and 10b 11 Net income tax. Subtract line 10c from line 9. If zero skip lines 12 through 15 and enter -0- on line 16 12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions) • Corporations. Enter the amount from Form 4626, line 12. • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54 15 Enter the greater of line 13 or line 14 16 Corporations. Enter the amount from Schedule I (Form 1041), line 54 17 698.00 17 Enter the smaller of line 6 or line 16. 17 698.00   | 4       | Carryforward of general business credit to 2017. Enter the amount from line 2 of Part III with   |     |                  |
| box D checked. See instructions 5 6 Add lines 1, 3, 4, and 5 7 Regular tax before credits:  • Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the sum of the amounts from Form 1040NR, lines 42 and 44 • Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return • Estates and frusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return  8 Alternative minimum tax: • Individuals. Enter the amount from Form 6251, line 35 • Corporations. Enter the amount from Form 4626, line 14. • Estates and frusts. Enter the amount from Schedule I (Form 1041), line 56 9 Add lines 7 and 8 9 180,180.00  10a Foreign tax credit b Certain allowable credits (see instructions) c Add lines 10a and 10b 11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16 11 Net income tax. Subtract line 10c from line 7. If zero or less, enter -0- 12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions) 14 Tentative minimum tax • Individuals. Enter the amount from Form 6251, line 33 • Corporations. Enter the amount from Schedule I (Form 1041), line 54 15 Enter the greater of line 13 or line 14 15 100,952.00 16 79,228.00 17 Enter the smaller of line 6 or line 16 17 698.00 18 Corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.  |         | box C checked. See instructions for statement to attach  | 4   |                  |
| Part II   | 5       | Carryback of general business credit from 2018. Enter the amount from line 2 of Part III with  |     |                  |
| Part II   |         | box D checked. See instructions  | 5   |                  |
| Regular tax before credits:  Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the sum of the amounts from Form 1040NR, lines 42 and 44.  Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return.  Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return.  Alternative minimum tax:  Individuals. Enter the amount from Form 6251, line 35.  Corporations. Enter the amount from Form 6261, line 14.  Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  Add lines 7 and 8.  Part income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16.  Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  Retregular tax. Subtract line 10c from Form 6251, line 33.  Corporations. Enter the amount from Form 6256, line 12.  Estates and trusts. Enter the amount from Form 6256, line 12.  Estates and trusts. Enter the amount from Form 6256, line 12.  Estates and trusts. Enter the amount from Form 6256, line 12.  Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54.  Enter the greater of line 13 or line 14.  Subtract line 15 from line 11. If zero or less, enter -0-  Enter the smaller of line 6 or line 16.  Corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.  | 6       |  | 6   | 698.00           |
| Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the sum of the amounts from Form 1040NR, lines 42 and 44.  Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return.  Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return.  Alternative minimum tax.  Individuals. Enter the amount from Form 6251, line 35.  Corporations. Enter the amount from Form 6251, line 35.  Add lines 7 and 8.  Part of the amount from Form 6251, line 35.  Add lines 7 and 8.  Individuals. Enter the amount from Form 6251, line 35.  Add lines 7 and 8.  Individuals. Enter the amount from Form 6251, line 35.  Add lines 7 and 8.  Individuals. Enter the amount from Form 6251, line 35.  Add lines 10a and 10b.  Individuals. Enter the amount from Form 6251, line 35.  Corporations. Subtract line 10c from line 7. If zero or less, enter -0-  Individuals. Enter the amount from Form 6251, line 33.  Corporations. Enter the amount from Form 6251, line 33.  Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  Enter the greater of line 13 or line 14.  Enter the greater of line 13 or line 14.  Enter the greater of line 13 or line 14.  Enter the smaller of line 6 or line 16.  Corporations. See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.  | Part II | Allowable Credit   |     |                  |
| sum of the amounts from Form 1040NR, lines 42 and 44  • Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return  • Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return  8 Alternative minimum tax:  • Individuals. Enter the amount from Form 6251, line 35.  • Corporations. Enter the amount from Form 4626, line 14.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  9 Add lines 7 and 8.  10a  10b  10c  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16.  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- line 16.  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  • Estates and trusts. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Estates and trusts. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Estates and trusts. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Enter the greater of line 13 or line 14.  5 Individuals. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Enter the greater of line 13 or line 14.  5 Individuals. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6251, line 33.  • Corporatio | 7       | Regular tax before credits:  |     |                  |
| Corporations. Enter the amount from Form 1120, Schedule J, Part I, line 2; or the applicable line of your return  Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return  Alternative minimum tax:  Individuals. Enter the amount from Form 6251, line 35.  Corporations. Enter the amount from Form 4626, line 14.  Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  Add lines 7 and 8.  Certain allowable credits (see instructions).  Add lines 10a and 10b.  Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16.  Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- line 16.  Tentative minimum tax:  Individuals. Enter the amount from Form 6251, line 33.  Corporations. Enter the amount from Form 6251, line 33.  Corporations. Enter the amount from Schedule I (Form 1041), line 54.  Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54.  Enter the greater of line 13 or line 14.  Corporations: Senter the amount from Form 6251, line 33.  Enter the greater of line 13 or line 14.  Enter the smaller of line 6 or line 16.  Corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   |         | • Individuals. Enter the sum of the amounts from Form 1040, lines 44 and 46, or the  |     |                  |
| applicable line of your return  Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return  Alternative minimum tax: Individuals. Enter the amount from Form 4626, line 12. Interest and trusts. Enter the amount from Schedule I (Form 1041), line 56.  Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- Istates and trusts. Enter the amount from line 12 over \$25,000 (see instructions).  Tentative minimum tax: Individuals. Enter the amount from Form 4626, line 12. Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  Interest and Inte |         | sum of the amounts from Form 1040NR, lines 42 and 44   |     |                  |
| e Estates and trusts. Enter the sum of the amounts from Form 1041, Schedule G, lines 1a and 1b; or the amount from the applicable line of your return.  8 Alternative minimum tax:  • Individuals. Enter the amount from Form 6251, line 35.  • Corporations. Enter the amount from Form 4626, line 14.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  9 Add lines 7 and 8.  • Certain allowable credits (see instructions).  • Add lines 10a and 10b.  10c  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16.  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  • Corporations. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 6261, line 12.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54.  15 Enter the greater of line 13 or line 14.  16 Subtract line 15 from line 11. If zero or less, enter -0-  17 Enter the smaller of line 6 or line 16.  C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.  |         | · · · · · · · · · · · · · · · · · · ·  |     |                  |
| lines 1a and 1b; or the amount from the applicable line of your return  Alternative minimum tax:  • Individuals. Enter the amount from Form 6251, line 35.  • Corporations. Enter the amount from Form 4626, line 14.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  9 Add lines 7 and 8  10a  b Certain allowable credits (see instructions).  c Add lines 10a and 10b  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  14 Tentative minimum tax:  • Individuals. Enter the amount from Form 4626, line 12.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54  15 Enter the greater of line 13 or line 14  16 Subtract line 15 from line 11. If zero or less, enter -0-  Enter the smaller of line 6 or line 16  C corporations. See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.  |         | applicable line of your return   | 7   | 180,180.00       |
| Alternative minimum tax:  • Individuals. Enter the amount from Form 6251, line 35.  • Corporations. Enter the amount from Form 4626, line 14.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  9 Add lines 7 and 8.  10a  Foreign tax credit  b Certain allowable credits (see instructions).  c Add lines 10a and 10b  10c  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- instructions).  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  14 Tentative minimum tax:  • Individuals. Enter the amount from Form 6251, line 33.  • Corporations. Enter the amount from Form 4626, line 12.  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54.  15 Enter the greater of line 13 or line 14  16 Subtract line 15 from line 11. If zero or less, enter -0-  Enter the smaller of line 6 or line 16  C corporations. See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   |         | · · · · · · · · · · · · · · · · · · ·  |     |                  |
| <ul> <li>Individuals. Enter the amount from Form 6251, line 35.</li> <li>Corporations. Enter the amount from Form 4626, line 14.</li> <li>Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.</li> <li>Add lines 7 and 8.</li> <li>Poreign tax credit</li> <li>Certain allowable credits (see instructions).</li> <li>Add lines 10a and 10b.</li> <li>Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16.</li> <li>Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-</li> <li>Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).</li> <li>Individuals. Enter the amount from Form 6251, line 33.</li> <li>Corporations. Enter the amount from Schedule I (Form 1041), line 54.</li> <li>Enter the greater of line 13 or line 14.</li> <li>Subtract line 15 from line 11. If zero or less, enter -0-</li> <li>Enter the smaller of line 6 or line 16.</li> <li>C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.</li> </ul>   |         |  |     |                  |
| • Corporations. Enter the amount from Form 4626, line 14. • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56.  9 Add lines 7 and 8   | 8       |  |     |                  |
| • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56   |         |  |     |                  |
| 9 180,180.00  10a Foreign tax credit  |         |  | 8   |                  |
| 10a Foreign tax credit b Certain allowable credits (see instructions) c Add lines 10a and 10b  10c  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions)  14 Tentative minimum tax:   | _       | · · · · · · · · · · · · · · · · · · ·  |     | 100 100 00       |
| b Certain allowable credits (see instructions). c Add lines 10a and 10b  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  14 Tentative minimum tax:     • Individuals. Enter the amount from Form 6251, line 33.     • Corporations. Enter the amount from Form 4626, line 12.     • Estates and trusts. Enter the amount from Schedule I     (Form 1041), line 54.  15 Enter the greater of line 13 or line 14  Subtract line 15 from line 11. If zero or less, enter -0-  16 79,228.00  17 Enter the smaller of line 6 or line 16.     C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   | 9       | Add lines 7 and 8  | 9   | 180,180.00       |
| b Certain allowable credits (see instructions). c Add lines 10a and 10b  11 Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  12 Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0- 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions). 14 Tentative minimum tax:     • Individuals. Enter the amount from Form 6251, line 33.     • Corporations. Enter the amount from Form 4626, line 12.     • Estates and trusts. Enter the amount from Schedule I     (Form 1041), line 54.  15 Enter the greater of line 13 or line 14  Subtract line 15 from line 11. If zero or less, enter -0-  Enter the smaller of line 6 or line 16. C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.  | 10a     | Foreign tax credit   |     |                  |
| Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  Individuals. Enter the amount from Form 6251, line 33  |         |  |     |                  |
| Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  14 Tentative minimum tax:  • Individuals. Enter the amount from Form 6251, line 33 • Corporations. Enter the amount from Form 4626, line 12  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54   | С       | Add lines 10a and 10b  | 10c |                  |
| Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-  13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions).  14 Tentative minimum tax:  • Individuals. Enter the amount from Form 6251, line 33 • Corporations. Enter the amount from Form 4626, line 12  • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54   |         |  |     |                  |
| 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions)  14 Tentative minimum tax:  • Individuals. Enter the amount from Form 6251, line 33  • Corporations. Enter the amount from Form 4626, line 12  • Estates and trusts. Enter the amount from Schedule I  (Form 1041), line 54  15 Enter the greater of line 13 or line 14  | 11      | Net income tax. Subtract line 10c from line 9. If zero, skip lines 12 through 15 and enter -0- on line 16  | 11  | 180,180.00       |
| 13 Enter 25% (0.25) of the excess, if any, of line 12 over \$25,000 (see instructions)  14 Tentative minimum tax:  • Individuals. Enter the amount from Form 6251, line 33  • Corporations. Enter the amount from Form 4626, line 12  • Estates and trusts. Enter the amount from Schedule I  (Form 1041), line 54  15 Enter the greater of line 13 or line 14  |         |  |     |                  |
| instructions)  Tentative minimum tax: Individuals. Enter the amount from Form 6251, line 33 Corporations. Enter the amount from Form 4626, line 12 Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54  Is Enter the greater of line 13 or line 14 Subtract line 15 from line 11. If zero or less, enter -0  The enter the smaller of line 6 or line 16 Corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   | 12      | Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-   |     |                  |
| instructions)  Tentative minimum tax: Individuals. Enter the amount from Form 6251, line 33 Corporations. Enter the amount from Form 4626, line 12 Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54  Is Enter the greater of line 13 or line 14 Subtract line 15 from line 11. If zero or less, enter -0  The enter the smaller of line 6 or line 16 Corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   |         |  |     |                  |
| Tentative minimum tax:  Individuals. Enter the amount from Form 6251, line 33  Corporations. Enter the amount from Form 4626, line 12  Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54  15 Enter the greater of line 13 or line 14  | 13      |  |     |                  |
| <ul> <li>Individuals. Enter the amount from Form 6251, line 33</li></ul>  |         | instructions)  |     |                  |
| <ul> <li>Corporations. Enter the amount from Form 4626, line 12.</li> <li>Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54.</li> <li>Enter the greater of line 13 or line 14.</li> <li>Subtract line 15 from line 11. If zero or less, enter -0-</li> <li>Enter the smaller of line 6 or line 16.</li> <li>C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.</li> </ul>  | 14      |  |     |                  |
| • Estates and trusts. Enter the amount from Schedule I (Form 1041), line 54 .  15 Enter the greater of line 13 or line 14   |         | 100 050 00   |     |                  |
| (Form 1041), line 54  |         | Corporations: Effect the amount from 1 offit 4020, line 12.  |     |                  |
| 15 Enter the greater of line 13 or line 14  |         |  |     |                  |
| Subtract line 15 from line 11. If zero or less, enter -0  |         |  |     | 100 050 00       |
| 17 Enter the smaller of line 6 or line 16   |         |  |     |                  |
| C corporations: See the line 17 instructions if there has been an ownership change, acquisition, or reorganization.   |         |  |     |                  |
| or reorganization.  | 17      |  | 17  | 090.00           |
|   |         |  |     |                  |
| I DE LADELWOLK NEUDUCION ACLITOLICE, SEC SEDALAC INSULUCIONS.   | For Pan | -  |     | Form 3800 (2017) |

| <b>Part</b> |  |         |             |
|-------------|--|---------|-------------|
| Note:       | If you are not required to report any amounts on lines 22 or 24 below, skip lines 18 through 25 and er   | ter -0- | on line 26. |
| 18          | Multiply line 14 by 75% (0.75). See instructions   | 18      | 75,714.00   |
| 19          | Enter the greater of line 13 or line 18  | 19      | 75,714.00   |
| 20          | Subtract line 19 from line 11. If zero or less, enter -0-  | 20      | 104,466.00  |
| 21          | Subtract line 17 from line 20. If zero or less, enter -0-  | 21      | 103,768.00  |
| 22          | Combine the amounts from line 3 of all Parts III with box A, C, or D checked   | 22      |             |
| 23          | Passive activity credit from line 3 of all Parts III with box B checked 23   |         |             |
| 24          | Enter the applicable passive activity credit allowed for 2017. See instructions  | 24      |             |
| 25          | Add lines 22 and 24  | 25      |             |
| 26          | Empowerment zone and renewal community employment credit allowed. Enter the smaller of line 21 or line 25  | 26      |             |
| 27          | Subtract line 13 from line 11. If zero or less, enter -0-  | 27      | 141,385.00  |
| 28          | Add lines 17 and 26  | 28      | 698.00      |
| 29          | Subtract line 28 from line 27. If zero or less, enter -0-  | 29      | 140,687.00  |
| 30          | Enter the general business credit from line 5 of all Parts III with box A checked  | 30      | 673.00      |
| 31          | Reserved   | 31      |             |
| 32          | Passive activity credits from line 5 of all Parts III with box B checked 32  |         |             |
| 33          | Enter the applicable passive activity credits allowed for 2017. See instructions   | 33      |             |
| 34          | Carryforward of business credit to 2017. Enter the amount from line 5 of Part III with box C checked and line 6 of Part III with box G checked. See instructions for statement to attach   | 34      |             |
| 35          | Carryback of business credit from 2018. Enter the amount from line 5 of Part III with box D checked. See instructions  | 35      |             |
| 36          | Add lines 30, 33, 34, and 35   | 36      | 673.00      |
| 37          | Enter the <b>smaller</b> of line 29 or line 36   | 37      | 673.00      |
| 38          | Credit allowed for the current year. Add lines 28 and 37.  Report the amount from line 38 (if smaller than the sum of Part I, line 6, and Part II, lines 25 and 36, see instructions) as indicated below or on the applicable line of your return.  Individuals. Form 1040, line 54, or Form 1040NR, line 51  Corporations. Form 1120, Schedule J, Part I, line 5c | 00      | 1,371.00    |
|             | • Estates and trusts. Form 1041, Schedule G, line 2b   | 38      | 1,3/1.00    |

Form **3800** (2017)

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Name(s) shown on return

THE MCKNIGHT FOUNDATION

Identifying number

41-0754835

| Par     | t III General Business Credits or Eligible Small Business Credits (see ins                                     | structi  | ons)                              |                              |
|---------|--|----------|-----------------------------------|------------------------------|
| Com     | plete a separate Part III for each box checked below (see instructions).                                       |          |                                   |                              |
| Α [     | X General Business Credit From a Non-Passive Activity <b>E</b> Reserved  |          |                                   |                              |
| в       | General Business Credit From a Passive Activity <b>F</b> Reserved  |          |                                   |                              |
| С       | General Business Credit Carryforwards G Eligible Smal  | Busi     | ness Credit Carryfor              | wards                        |
| D       | General Business Credit Carrybacks H Reserved  |          |                                   |                              |
|         | If you are filing more than one Part III with box A or B checked, complete and attach first an a               |          |                                   |                              |
|         | III with box A or B checked. Check here if this is the consolidated Part III                                   |          |                                   |                              |
|         | (a) Description of credit  |          | <b>(b)</b> If claiming the credit | (c)                          |
|         | On any line where the credit is from more than one source, a separate Part III is needed for e                 | each     | from a pass-through               | Enter the appropriate amount |
|         | through entity.  | 4 -      | entity, enter the EIN             |                              |
| _       | Investment (Form 3468, Part II only) (attach Form 3468)  | 1a       |                                   |                              |
| b       | Reserved Increasing research activities (Form 6765)  | 1b       |                                   | 2.00                         |
| c<br>d  | Low-income housing (Form 8586, Part I only)  | 1c<br>1d |                                   | 696.00                       |
| e       | Disabled access (Form 8826) (see instructions for limitation)  | 1e       |                                   | 030.00                       |
| f       | Renewable electricity, refined coal, and Indian coal production (Form 8835)                                    | 1f       |                                   |                              |
| g       | Indian employment (Form 8845)  | 1g       |                                   |                              |
| 9<br>h  | - · · · · · · · · · · · · · · · · · · ·  | 1h       |                                   |                              |
| i       | New markets (Form 8874)  | 1i       |                                   |                              |
| i       | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)                        | 1j       |                                   |                              |
| ,<br>k  |  | ·,       |                                   |                              |
|         | instructions for limitation)   | 1k       |                                   |                              |
| 1       | Biodiesel and renewable diesel fuels (attach Form 8864)  | 11       |                                   |                              |
| m       | Low sulfur diesel fuel production (Form 8896)  | 1m       |                                   |                              |
| n       | B1 (W 1 1 1 (F 2000)   | 1n       |                                   |                              |
| o       |  | 10       |                                   |                              |
| р       | Energy efficient home (Form 8908)  | 1р       |                                   |                              |
| q       | Energy efficient appliance (carryforward only)   | 1q       |                                   |                              |
| r       | Alternative motor vehicle (Form 8910)  | 1r       |                                   |                              |
| s       | Alternative fuel vehicle refueling property (Form 8911)  | 1s       |                                   |                              |
| t       | Enhanced oil recovery credit (Form 8830)   | 1t       |                                   |                              |
| u       | Mine rescue team training (Form 8923)  | 1u       |                                   |                              |
| ٧       | Agricultural chemicals security (carryforward only)  | 1v       |                                   |                              |
| W       | Employer differential wage payments (Form 8932)  | 1w       |                                   |                              |
| X       | /  | 1x       |                                   |                              |
| У       | ,  | 1 y      |                                   |                              |
|         | Qualified plug-in electric vehicle (carryforward only)   | 1z       |                                   |                              |
| a       | a Employee retention (Form 5884-A)   | 1aa      |                                   |                              |
|         | b General credits from an electing large partnership (Schedule K-1 (Form 1065-B))                              | 1bb      |                                   |                              |
| Z       | z Other. Oil and gas production from marginal wells (Form 8904) and certain                                    |          |                                   |                              |
| 2       | other credits (see instructions)  Add lines 1a through 1zz and enter here and on the applicable line of Part I | 1zz      |                                   | 698.00                       |
| 2       | Enter the amount from Form 8844 here and on the applicable line of Part II                                     | 3        |                                   | 0,00.00                      |
| 3<br>4a |  | 4a       |                                   |                              |
| 4a<br>b |  | 4a<br>4b |                                   |                              |
| C       | Biofuel producer (Form 6478)   | 4c       |                                   |                              |
| d       | Low-income housing (Form 8586, Part II)  | 4d       |                                   |                              |
| e       | Renewable electricity, refined coal, and Indian coal production (Form 8835)                                    | 4e       |                                   |                              |
| f       | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)                          | 4f       |                                   | 673.00                       |
| g<br>g  | Qualified railroad track maintenance (Form 8900)   | 4g       |                                   |                              |
| h       |  | 4h       |                                   |                              |
| i       | Increasing research activities (Form 6765)   | 4i       |                                   |                              |
| j       | Reserved   | 4j       |                                   |                              |
| z       | Other  | 4z       |                                   |                              |
| 5       | Add lines 4a through 4z and enter here and on the applicable line of Part II                                   | 5        |                                   | 673.00                       |
| 6       | Add lines 2, 3, and 5 and enter here and on the applicable line of Part II                                     | 6        |                                   | 1,371.00                     |

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| Par | t III General Business Credits or Eligible Small Business Credits (see ins                      | struction | ons)                                       |                        |
|-----|---|-----------|--|------------------------|
| Com | plete a separate Part III for each box checked below (see instructions).                        |           |  |                        |
| Α   | X General Business Credit From a Non-Passive Activity E Reserved                                |           |  |                        |
| в   | General Business Credit From a Passive Activity F Reserved                                      |           |  |                        |
| С   | General Business Credit Carryforwards G Eligible Smal   | l Busii   | ness Credit Carryfor                       | wards                  |
| D   | General Business Credit Carrybacks H Reserved   |           |  |                        |
| 1   | f you are filing more than one Part III with box A or B checked, complete and attach first an a | additio   | nal Part III combining                     | amounts from all Parts |
|     | II with box A or B checked. Check here if this is the consolidated Part III                     |           |  | ▶ X                    |
|     | (a) Description of credit   |           | (b)  | (c)                    |
|     | On any line where the credit is from more than one source, a separate Part III is needed for    | each      | If claiming the credit from a pass-through | Enter the appropriate  |
|     | through entity.   |           | entity, enter the EIN                      | amount                 |
| 1 a | Investment (Form 3468, Part II only) (attach Form 3468)   | 1a        |  |                        |
| b   | Reserved  | 1b        |  | 10.00                  |
| С   | Increasing research activities (Form 6765)  | 1c        | 26-3872534                                 | 40.00                  |
| d   | Low-income housing (Form 8586, Part I only)   | 1d        | 27-4846111                                 | 2.00                   |
| е   | Disabled access (Form 8826) (see instructions for limitation)                                   | 1e        |  |                        |
| f   | Renewable electricity, refined coal, and Indian coal production (Form 8835)                     | 1f        |  |                        |
| g   | Indian employment (Form 8845)   | 1g        |  |                        |
| h   | Orphan drug (Form 8820)   | 1h        |  |                        |
| i   | New markets (Form 8874)   | 1i        |  |                        |
| j   | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)         | 1j        |  |                        |
| k   | Employer-provided child care facilities and services (Form 8882) (see                           |           |  |                        |
|     | instructions for limitation)  | 1k        |  |                        |
| I   | Biodiesel and renewable diesel fuels (attach Form 8864)   | 11        |  |                        |
| m   | '   | 1m        |  |                        |
| n   | Distilled spirits (Form 8906)   | 1n        |  |                        |
| 0   | Nonconventional source fuel (carryforward only)   | 10        |  |                        |
| р   | Energy efficient home (Form 8908)   | 1p        |  |                        |
| q   | Energy efficient appliance (carryforward only)  | 1q        |  |                        |
| r   | Alternative motor vehicle (Form 8910)   | 1r        |  |                        |
| s   | Alternative fuel vehicle refueling property (Form 8911)   | 1s        |  |                        |
| t   | Enhanced oil recovery credit (Form 8830)  | 1t        |  |                        |
| u   | Mine rescue team training (Form 8923)   | 1u        |  |                        |
| ٧   | Agricultural chemicals security (carryforward only)   | 1v        |  |                        |
| W   |   | 1w        |  |                        |
| X   | Carbon dioxide sequestration (Form 8933)  | 1x        |  |                        |
| У   | Qualified plug-in electric drive motor vehicle (Form 8936)                                      | 1y        |  |                        |
|     | Qualified plug-in electric vehicle (carryforward only)  | 1z        |  |                        |
| a   | a Employee retention (Form 5884-A)  | 1aa       |  |                        |
|     | b General credits from an electing large partnership (Schedule K-1 (Form 1065-B))               | 1bb       |  |                        |
| Z   | Other. Oil and gas production from marginal wells (Form 8904) and certain                       |           |  |                        |
|     | other credits (see instructions)  | 1zz       |  | 40.00                  |
| 2   | Add lines 1a through 1zz and enter here and on the applicable line of Part I                    | 2         |  | 42.00                  |
| 3   | Enter the amount from Form 8844 here and on the applicable line of Part II                      | 3         |  |                        |
| 4a  | Investment (Form 3468, Part III) (attach Form 3468)   | 4a        |  |                        |
| b   | Work opportunity (Form 5884)  | 4b        |  |                        |
| С   | Biofuel producer (Form 6478)  | 4c        |  |                        |
| d   | Low-income housing (Form 8586, Part II)   | 4d        |  |                        |
| е   | Renewable electricity, refined coal, and Indian coal production (Form 8835)                     | 4e        | 20 4707675                                 | 240.00                 |
| f   | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)           | 4f        | 20-4787675                                 | 340.00                 |
| g   | Qualified railroad track maintenance (Form 8900)  | 4g        |  |                        |
| h   | Small employer health insurance premiums (Form 8941)  | 4h        |  |                        |
| i   | Increasing research activities (Form 6765)  | 4i        |  |                        |
| j   | Reserved  | 4j        |  |                        |
| z   | Other   | 4z        |  | 340.00                 |
| 5   | Add lines 4a through 4z and enter here and on the applicable line of Part II                    | 5<br>6    |  | 340.00                 |
| n   | AND HOUSE A 3 AND A AND ENTER NOTE AND AN THE ANNICANIE HIND OF PART II                         | i h       |  | 1 307.400              |

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| Par      | Till General Business Credits or Eligible Small Business Credits (see ins                        | struction | ons)  |                        |
|----------|--|-----------|---|------------------------|
| Com      | plete a separate Part III for each box checked below (see instructions).                         |           |   |                        |
| Α        | X General Business Credit From a Non-Passive Activity E Reserved                                 |           |   |                        |
| в        | General Business Credit From a Passive Activity F Reserved                                       |           |   |                        |
| С        | General Business Credit Carryforwards G Eligible Smal  | l Busii   | ness Credit Carryfor                          | wards                  |
| D        | General Business Credit Carrybacks H Reserved  |           |   |                        |
| 1        | If you are filing more than one Part III with box A or B checked, complete and attach first an a | additio   | nal Part III combining                        | amounts from all Parts |
|          | III with box A or B checked. Check here if this is the consolidated Part III                     |           |   | ▶ X                    |
|          | (a) Description of credit  |           | (b)   | (c)                    |
|          | : On any line where the credit is from more than one source, a separate Part III is needed for   | each      | If claiming the credit<br>from a pass-through | Enter the appropriate  |
|          | -through entity.   |           | entity, enter the EIN                         | amount                 |
| 1 a      | Investment (Form 3468, Part II only) (attach Form 3468)  | 1a        |   |                        |
| b        |  | 1b        | 00 00441                                      | 2= 22                  |
| С        | Increasing research activities (Form 6765)   | 1c        | 80-0966179                                    | 37.00                  |
| d        | Low-income housing (Form 8586, Part I only)  | 1d        |   |                        |
| е        | Disabled access (Form 8826) (see instructions for limitation)                                    | 1e        |   |                        |
| f        | Renewable electricity, refined coal, and Indian coal production (Form 8835)                      | 1f        |   |                        |
| g        | Indian employment (Form 8845)  | 1g        |   |                        |
| h        | Orphan drug (Form 8820)  | 1h        |   |                        |
| i        | New markets (Form 8874)  | 1i        |   |                        |
| j        | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)          | 1j        |   |                        |
| k        | , , ,  |           |   |                        |
|          | instructions for limitation)   | 1k        |   |                        |
| I        | Biodiesel and renewable diesel fuels (attach Form 8864)  | 11        |   |                        |
| m        | '  | 1m        |   |                        |
| n        | /  | 1n        |   |                        |
| 0        | Nonconventional source fuel (carryforward only)  | 10        |   |                        |
| р        | Energy efficient home (Form 8908)  | 1p        |   |                        |
| q        | Energy efficient appliance (carryforward only)   | 1q        |   |                        |
| r        | Alternative motor vehicle (Form 8910)  | 1r        |   |                        |
| S        | Alternative fuel vehicle refueling property (Form 8911)  | 1s        |   |                        |
| t        | Enhanced oil recovery credit (Form 8830)   | 1t        |   |                        |
| u        | Mine rescue team training (Form 8923)  | 1u        |   |                        |
| ٧        | Agricultural chemicals security (carryforward only)  | 1v        |   |                        |
| W        | Employer differential wage payments (Form 8932)  | 1w        |   |                        |
| X        | Carbon dioxide sequestration (Form 8933)   | 1x        |   |                        |
| у        | Qualified plug-in electric drive motor vehicle (Form 8936)                                       | 1y        |   |                        |
|          | Qualified plug-in electric vehicle (carryforward only)   | 1z        |   |                        |
| a        | a Employee retention (Form 5884-A)   | 1aa       |   |                        |
|          | b General credits from an electing large partnership (Schedule K-1 (Form 1065-B))                | 1bb       |   |                        |
| Z        | z Other. Oil and gas production from marginal wells (Form 8904) and certain                      |           |   |                        |
| _        | other credits (see instructions)   | 1zz       |   | 37.00                  |
| 2        | Add lines 1a through 1zz and enter here and on the applicable line of Part I                     | 2         |   | 37.00                  |
| 3        | Enter the amount from Form 8844 here and on the applicable line of Part II                       | 3         |   |                        |
| 4a       | Investment (Form 3468, Part III) (attach Form 3468)  | 4a        |   |                        |
| b        |  | 4b        |   |                        |
| С.       | Biofuel producer (Form 6478)   | 4c        |   |                        |
| d        |  | 4d        |   |                        |
| e        | Renewable electricity, refined coal, and Indian coal production (Form 8835)                      | 4e        | 26-1269055                                    | 333.00                 |
| f<br>~   | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)            | 4f        | ZO TZ03033                                    | 333.00                 |
| g        | Qualified railroad track maintenance (Form 8900)   | 4g        |   |                        |
| h<br>:   | Small employer health insurance premiums (Form 8941)   | 4h        |   |                        |
| i<br>:   | Increasing research activities (Form 6765)   | 4i        |   |                        |
| J        | Reserved   | 4j        |   |                        |
| _ Z<br>_ | Other  Add lines 4a through 4z and enter here and on the applicable line of Part II              | 4z        |   | 333.00                 |
| 5        | Add lines 4a through 4z and enter here and on the applicable line of Part II                     | <u>5</u>  |   | 370.00                 |

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| Par    | t III General Business Credits or Eligible Small Business Credits (see ins   | struction | ons)  |                              |
|--------|--|-----------|---|------------------------------|
| Com    | plete a separate Part III for each box checked below (see instructions).   |           |   |                              |
| Α      | X General Business Credit From a Non-Passive Activity E Reserved   |           |   |                              |
| В      | General Business Credit From a Passive Activity F Reserved   |           |   |                              |
| С      | General Business Credit Carryforwards G Eligible Smal  | l Busii   | ness Credit Carryfor                          | wards                        |
| D      | General Business Credit Carrybacks H Reserved  |           |   |                              |
|        | If you are filing more than one Part III with box A or B checked, complete and attach first an a   |           |   |                              |
|        | III with box A or B checked. Check here if this is the consolidated Part III   |           |   | <u> ▶ [X]</u>                |
|        | (a) Description of credit  |           | (b)   | (c)                          |
|        | : On any line where the credit is from more than one source, a separate Part III is needed for   | each      | If claiming the credit<br>from a pass-through | Enter the appropriate amount |
|        | through entity.  |           | entity, enter the EIN                         | amount                       |
| _      | Investment (Form 3468, Part II only) (attach Form 3468)  | 1a        |   |                              |
| b      |  | 1b        | 47-0754835                                    | 2 00                         |
| C      | Increasing research activities (Form 6765)   | 1c        | 47-0754835                                    | 3.00                         |
| d      | Low-income housing (Form 8586, Part I only)  | 1d        |   |                              |
| e      | Disabled access (Form 8826) (see instructions for limitation)  | 1e        |   |                              |
| f      | Renewable electricity, refined coal, and Indian coal production (Form 8835)  | 1f        |   |                              |
| g      | Indian employment (Form 8845)  | 1g        |   |                              |
| h<br>: | Orphan drug (Form 8820)  | 1h        |   |                              |
| !<br>: | New markets (Form 8874)  | 1i        |   |                              |
| J      | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)<br>Employer-provided child care facilities and services (Form 8882) (see | 1j        |   |                              |
| k      |  | 1k        |   |                              |
|        | instructions for limitation) Biodiesel and renewable diesel fuels (attach Form 8864)   | 11        |   |                              |
| l<br>m |  | 1m        |   |                              |
| m<br>n |  | 1n        |   |                              |
| 0      | Distilled spirits (Form 8906)  Nonconventional source fuel (carryforward only)   | 10        |   |                              |
| p      | Energy efficient home (Form 8908)  | 1p        |   |                              |
| q      | Energy efficient appliance (carryforward only)   | 1q        |   |                              |
| r      | Alternative motor vehicle (Form 8910)  | 1r        |   |                              |
| s      | Alternative fuel vehicle refueling property (Form 8911)  | 1s        |   |                              |
| t      | Enhanced oil recovery credit (Form 8830)   | 1t        |   |                              |
| u      | Mine rescue team training (Form 8923)  | 1u        |   |                              |
| V      | Agricultural chemicals security (carryforward only)  | 1v        |   |                              |
| w      | Employer differential wage payments (Form 8932)  | 1w        |   |                              |
| х      | Carbon dioxide sequestration (Form 8933)   | 1x        |   |                              |
| У      | Qualified plug-in electric drive motor vehicle (Form 8936)   | 1y        |   |                              |
| z      | Qualified plug-in electric vehicle (carryforward only)   | 1z        |   |                              |
|        | a Employee retention (Form 5884-A)   | 1aa       |   |                              |
| b      | b General credits from an electing large partnership (Schedule K-1 (Form 1065-B))  | 1bb       |   |                              |
| Z      | Other. Oil and gas production from marginal wells (Form 8904) and certain  |           |   |                              |
|        | other credits (see instructions)   | 1zz       |   |                              |
| 2      | Add lines 1a through 1zz and enter here and on the applicable line of Part I   | 2         |   | 3.00                         |
| 3      | Enter the amount from Form 8844 here and on the applicable line of Part II   | 3         |   |                              |
| 4a     | Investment (Form 3468, Part III) (attach Form 3468)  | 4a        |   |                              |
| b      |  | 4b        |   |                              |
| С      | Biofuel producer (Form 6478)   | 4c        |   |                              |
| d      | ,  | 4d        |   |                              |
| е      | Renewable electricity, refined coal, and Indian coal production (Form 8835)  | 4e        |   |                              |
| f      | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)  | 4f        |   |                              |
| g      | Qualified railroad track maintenance (Form 8900)   | 4g        |   |                              |
| h      | Small employer health insurance premiums (Form 8941)   | 4h        |   |                              |
| i      | Increasing research activities (Form 6765)   | 4i        |   |                              |
| j      | Reserved   | 4j        |   |                              |
| z      | Other  | 4z        |   |                              |
| 5      | Add lines 4a through 4z and enter here and on the applicable line of Part II   | <u>5</u>  |   | 3.00                         |
|        |  |           |   |                              |

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| Part   | General Business Credits or Eligible Small Business Credits (see ins                           | structi  | ons)  |                        |
|--------|--|----------|---|------------------------|
| Com    | plete a separate Part III for each box checked below (see instructions).                       |          |   |                        |
| Α      | X General Business Credit From a Non-Passive Activity <b>E</b> Reserved                        |          |   |                        |
| в      | General Business Credit From a Passive Activity F Reserved                                     |          |   |                        |
| С      | General Business Credit Carryforwards G Eligible Small   | Busi     | ness Credit Carryfor                          | wards                  |
| D L    | General Business Credit Carrybacks H Reserved  |          |   |                        |
| I II   | you are filing more than one Part III with box A or B checked, complete and attach first an a  | additio  | nal Part III combining                        | amounts from all Parts |
| П      | I with box A or B checked. Check here if this is the consolidated Part III                     |          |   | <b>▶</b> [X]           |
|        | (a) Description of credit  |          | (b)   | (c)                    |
| lote:  | On any line where the credit is from more than one source, a separate Part III is needed for e | each     | If claiming the credit<br>from a pass-through | Enter the appropriate  |
|        | hrough entity.   |          | entity, enter the EIN                         | amount                 |
| 1 a    | Investment (Form 3468, Part II only) (attach Form 3468)  | 1a       |   |                        |
| b      | Reserved   | 1b       | 00 4046111                                    | 0.40.00                |
| С      | Increasing research activities (Form 6765)   | 1c       | 27-4846111                                    | 248.00                 |
| d      | Low-income housing (Form 8586, Part I only)  | 1d       |   |                        |
| е      | Disabled access (Form 8826) (see instructions for limitation)                                  | 1e       |   |                        |
| f      | Renewable electricity, refined coal, and Indian coal production (Form 8835)                    | 1f       |   |                        |
| g      | Indian employment (Form 8845)  | 1g       |   |                        |
| h      | Orphan drug (Form 8820)  | 1h       |   |                        |
| i      | New markets (Form 8874)  | 1i       |   |                        |
| j      | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)        | 1j       |   |                        |
| k      | Employer-provided child care facilities and services (Form 8882) (see                          |          |   |                        |
| _      | instructions for limitation)   | 1k       |   |                        |
| ı      | Biodiesel and renewable diesel fuels (attach Form 8864)  | 11       |   |                        |
| m      |  | 1m       |   |                        |
| n      | Distilled spirits (Form 8906)  | 1n       |   |                        |
| 0      | Nonconventional source fuel (carryforward only)  | 10       |   |                        |
| р      | Energy efficient home (Form 8908)  | 1p       |   |                        |
| q      | Energy efficient appliance (carryforward only)   | 1q       |   |                        |
| r      | Alternative motor vehicle (Form 8910)  | 1r       |   |                        |
| S      | Alternative fuel vehicle refueling property (Form 8911)  | 1s       |   |                        |
| t<br>  | Enhanced oil recovery credit (Form 8830)   | 1t<br>1u |   |                        |
| u<br>v | Mine rescue team training (Form 8923) Agricultural chemicals security (carryforward only)      | 1v       |   |                        |
| w      | Employer differential wage payments (Form 8932)  | 1w       |   |                        |
| X      | Carbon dioxide sequestration (Form 8933)   | 1x       |   |                        |
| v      | Qualified plug-in electric drive motor vehicle (Form 8936)                                     | 1y       |   |                        |
| z      | Qualified plug-in electric vehicle (carryforward only)   | 1z       |   |                        |
| aa     | Employee retention (Form 5884-A)   | 1aa      |   |                        |
| bb     | General credits from an electing large partnership (Schedule K-1 (Form 1065-B))                | 1bb      |   |                        |
|        | Other. Oil and gas production from marginal wells (Form 8904) and certain                      |          |   |                        |
|        | other credits (see instructions)   | 1zz      |   |                        |
| 2      | Add lines 1a through 1zz and enter here and on the applicable line of Part I                   | 2        |   | 248.00                 |
| 3      | Enter the amount from Form 8844 here and on the applicable line of Part II                     | 3        |   |                        |
| 4a     | Investment (Form 3468, Part III) (attach Form 3468)  | 4a       |   |                        |
| b      | Work opportunity (Form 5884)   | 4b       |   |                        |
| С      | Biofuel producer (Form 6478)   | 4c       |   |                        |
| d      | Low-income housing (Form 8586, Part II)  | 4d       |   |                        |
| е      | Renewable electricity, refined coal, and Indian coal production (Form 8835)                    | 4e       |   |                        |
| f      | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)          | 4f       |   |                        |
| g      | Qualified railroad track maintenance (Form 8900)   | 4g       |   |                        |
| h      | Small employer health insurance premiums (Form 8941)   | 4h       |   |                        |
| i      | Increasing research activities (Form 6765)   | 4i       |   |                        |
| j      | Reserved   | 4j       |   |                        |
| z      | Other  | 4z       |   |                        |
| 5      | Add lines 4a through 4z and enter here and on the applicable line of Part II                   | 5        |   | 040.00                 |
| 6      | Add lines 2, 3, and 5 and enter here and on the applicable line of Part II                     | 6        |   | 248.00                 |

10/26/2018 11:20:25 AM

Name(s) shown on return

THE MCKNIGHT FOUNDATION

Identifying number

41-0754835

| Part   | General Business Credits or Eligible Small Business Credits (see ins                           | structi  | ons)  |                        |
|--------|--|----------|---|------------------------|
| Com    | plete a separate Part III for each box checked below (see instructions).                       |          |   |                        |
| Α      | X General Business Credit From a Non-Passive Activity <b>E</b> Reserved                        |          |   |                        |
| в      | General Business Credit From a Passive Activity F Reserved                                     |          |   |                        |
| С      | General Business Credit Carryforwards G Eligible Small   | Busi     | ness Credit Carryfor                          | wards                  |
| D L    | General Business Credit Carrybacks H Reserved  |          |   |                        |
| I II   | you are filing more than one Part III with box A or B checked, complete and attach first an a  | additio  | nal Part III combining                        | amounts from all Parts |
| П      | I with box A or B checked. Check here if this is the consolidated Part III                     |          |   | <b>X</b>               |
|        | (a) Description of credit  |          | (b)   | (c)                    |
| lote:  | On any line where the credit is from more than one source, a separate Part III is needed for e | each     | If claiming the credit<br>from a pass-through | Enter the appropriate  |
|        | hrough entity.   |          | entity, enter the EIN                         | amount                 |
| 1 a    | Investment (Form 3468, Part II only) (attach Form 3468)  | 1a       |   |                        |
| b      | Reserved   | 1b       | 00 4505655                                    | 150.00                 |
| С      | Increasing research activities (Form 6765)   | 1c       | 20-4787675                                    | 173.00                 |
| d      | Low-income housing (Form 8586, Part I only)  | 1d       |   |                        |
| е      | Disabled access (Form 8826) (see instructions for limitation)                                  | 1e       |   |                        |
| f      | Renewable electricity, refined coal, and Indian coal production (Form 8835)                    | 1f       |   |                        |
| g      | Indian employment (Form 8845)  | 1g       |   |                        |
| h      | Orphan drug (Form 8820)  | 1h       |   |                        |
| i      | New markets (Form 8874)  | 1i       |   |                        |
| j      | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)        | 1j       |   |                        |
| k      | Employer-provided child care facilities and services (Form 8882) (see                          |          |   |                        |
| _      | instructions for limitation)   | 1k       |   |                        |
| ı      | Biodiesel and renewable diesel fuels (attach Form 8864)  | 11       |   |                        |
| m      |  | 1m       |   |                        |
| n      | Distilled spirits (Form 8906)  | 1n       |   |                        |
| 0      | Nonconventional source fuel (carryforward only)  | 10       |   |                        |
| р      | Energy efficient home (Form 8908)  | 1p       |   |                        |
| q      | Energy efficient appliance (carryforward only)   | 1q       |   |                        |
| r      | Alternative motor vehicle (Form 8910)  | 1r       |   |                        |
| S      | Alternative fuel vehicle refueling property (Form 8911)  | 1s       |   |                        |
| t<br>  | Enhanced oil recovery credit (Form 8830)   | 1t<br>1u |   |                        |
| u<br>v | Mine rescue team training (Form 8923) Agricultural chemicals security (carryforward only)      | 1v       |   |                        |
| w      | Employer differential wage payments (Form 8932)  | 1w       |   |                        |
| X      | Carbon dioxide sequestration (Form 8933)   | 1x       |   |                        |
| V      | Qualified plug-in electric drive motor vehicle (Form 8936)                                     | 1y       |   |                        |
| z      | Qualified plug-in electric vehicle (carryforward only)   | 1z       |   |                        |
| aa     | Employee retention (Form 5884-A)   | 1aa      |   |                        |
| bb     | General credits from an electing large partnership (Schedule K-1 (Form 1065-B))                | 1bb      |   |                        |
|        | Other. Oil and gas production from marginal wells (Form 8904) and certain                      |          |   |                        |
|        | other credits (see instructions)   | 1zz      |   |                        |
| 2      | Add lines 1a through 1zz and enter here and on the applicable line of Part I                   | 2        |   | 173.00                 |
| 3      | Enter the amount from Form 8844 here and on the applicable line of Part II                     | 3        |   |                        |
| 4a     | Investment (Form 3468, Part III) (attach Form 3468)  | 4a       |   |                        |
| b      | Work opportunity (Form 5884)   | 4b       |   |                        |
| С      | Biofuel producer (Form 6478)   | 4c       |   |                        |
| d      | Low-income housing (Form 8586, Part II)  | 4d       |   |                        |
| е      | Renewable electricity, refined coal, and Indian coal production (Form 8835)                    | 4e       |   |                        |
| f      | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)          | 4f       |   |                        |
| g      | Qualified railroad track maintenance (Form 8900)   | 4g       |   |                        |
| h      | Small employer health insurance premiums (Form 8941)   | 4h       |   |                        |
| i      | Increasing research activities (Form 6765)   | 4i       |   |                        |
| j      | Reserved   | 4j       |   |                        |
| z      | Other  | 4z       |   |                        |
| 5      | Add lines 4a through 4z and enter here and on the applicable line of Part II                   | 5        |   | 172 00                 |
| 6      | Add lines 2, 3, and 5 and enter here and on the applicable line of Part II                     | 6        |   | 173.00                 |

Name(s) shown on return

THE MCKNIGHT FOUNDATION

Identifying number

41-0754835

| Par  | General Business Credits or Eligible Small Business Credits (see ins                            | tructi | ons)                                      |                        |
|------|---|--------|---|------------------------|
| Com  | plete a separate Part III for each box checked below (see instructions).                        |        |   |                        |
| Α    | X General Business Credit From a Non-Passive Activity <b>E</b> Reserved                         |        |   |                        |
| В    | General Business Credit From a Passive Activity F Reserved                                      |        |   |                        |
| С    |   | Busi   | ness Credit Carryfor                      | wards                  |
| D    | General Business Credit Carrybacks H Reserved   |        | ,   |                        |
| ı    | f you are filing more than one Part III with box A or B checked, complete and attach first an a | dditio | nal Part III combining                    | amounts from all Parts |
|      | II with box A or B checked. Check here if this is the consolidated Part III                     |        |   |                        |
|      | (a) Description of credit   |        | (b)                                       | (c)                    |
| lote | On any line where the credit is from more than one source, a separate Part III is needed for e  | ach    | If claiming the credit                    | Enter the appropriate  |
|      | through entity.   |        | from a pass-through entity, enter the EIN | amount                 |
| 1 a  | Investment (Form 3468, Part II only) (attach Form 3468)   | 1a     |   |                        |
| b    | Reserved  | 1b     |   |                        |
| С    | Increasing research activities (Form 6765)  | 1c     | 26-1269055                                | 195.00                 |
| d    | Low-income housing (Form 8586, Part I only)   | 1d     |   |                        |
| е    | Disabled access (Form 8826) (see instructions for limitation)                                   | 1e     |   |                        |
| f    | Renewable electricity, refined coal, and Indian coal production (Form 8835)                     | 1f     |   |                        |
| g    | Indian employment (Form 8845)   | 1g     |   |                        |
| h    | Orphan drug (Form 8820)   | 1h     |   |                        |
| i    | New markets (Form 8874)   | 1i     |   |                        |
| j    | Small employer pension plan startup costs (Form 8881) (see instructions for limitation)         | 1j     |   |                        |
| k    | Employer-provided child care facilities and services (Form 8882) (see                           |        |   |                        |
|      | instructions for limitation)  | 1k     |   |                        |
| ı    | Biodiesel and renewable diesel fuels (attach Form 8864)   | 11     |   |                        |
| n    | Low sulfur diesel fuel production (Form 8896)   | 1m     |   |                        |
| n    | Distilled spirits (Form 8906)   | 1n     |   |                        |
| o    | Nonconventional source fuel (carryforward only)   | 10     |   |                        |
| р    | Energy efficient home (Form 8908)   | 1p     |   |                        |
| q    | Energy efficient appliance (carryforward only)  | 1q     |   |                        |
| r    | Alternative motor vehicle (Form 8910)   | 1r     |   |                        |
| s    | Alternative fuel vehicle refueling property (Form 8911)   | 1s     |   |                        |
| t    | Enhanced oil recovery credit (Form 8830)  | 1t     |   |                        |
| u    | Mine rescue team training (Form 8923)   | 1u     |   |                        |
| ٧    | Agricultural chemicals security (carryforward only)   | 1v     |   |                        |
| w    | E   | 1w     |   |                        |
| х    | Carbon dioxide sequestration (Form 8933)  | 1x     |   |                        |
| ٧    | Qualified plug-in electric drive motor vehicle (Form 8936)                                      | 1y     |   |                        |
| z    | Qualified plug-in electric vehicle (carryforward only)  | 1z     |   |                        |
| а    | a Employee retention (Form 5884-A)  | 1aa    |   |                        |
| b    | General credits from an electing large partnership (Schedule K-1 (Form 1065-B))                 | 1bb    |   |                        |
|      | Other. Oil and gas production from marginal wells (Form 8904) and certain                       |        |   |                        |
|      | other credits (see instructions)  | 1zz    |   |                        |
| 2    | Add lines 1a through 1zz and enter here and on the applicable line of Part I                    | 2      |   | 195.00                 |
| 3    | Enter the amount from Form 8844 here and on the applicable line of Part II                      | 3      |   |                        |
| 4a   | Investment (Form 3468, Part III) (attach Form 3468)   | 4a     |   |                        |
| b    | Work opportunity (Form 5884)  | 4b     |   |                        |
| С    | Biofuel producer (Form 6478)  | 4c     |   |                        |
| d    | Low-income housing (Form 8586, Part II)   | 4d     |   |                        |
| е    | Renewable electricity, refined coal, and Indian coal production (Form 8835)                     | 4e     |   |                        |
| f    | Employer social security and Medicare taxes paid on certain employee tips (Form 8846)           | 4f     |   |                        |
| g    | Qualified railroad track maintenance (Form 8900)  | 4g     |   |                        |
| h    | Small employer health insurance premiums (Form 8941)  | 4h     |   |                        |
| i    | Increasing research activities (Form 6765)  | 4i     |   |                        |
| i    | Reserved  | 4j     |   |                        |
| z    | Other   | 4z     |   |                        |
| 5    | Add lines 4a through 4z and enter here and on the applicable line of Part II                    | 5      |   |                        |
| 6    | Add lines 2, 3, and 5 and enter here and on the applicable line of Part II                      |        |   | 195.00                 |

#### **SCHEDULE D** (Form 1120)

Department of the Treasury Internal Revenue Service

**Capital Gains and Losses** 

Attach to Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-IC-DISC, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF, or certain Forms 990-T.

► Go to www.irs.gov/Form1120 for instructions and the latest information.

OMB No. 1545-0123

Employer identification number THE MCKNIGHT FOUNDATION 41-0754835 Short-Term Capital Gains and Losses—Assets Held One Year or Less See instructions for how to figure the amounts to enter on (g) Adjustments to gain (h) Gain or (loss) the lines below. or loss from Form(s) Subtract column (e) from Proceeds Cost 8949, Part I, line 2, column (d) and combine This form may be easier to complete if you round off cents to (or other basis) (sales price) column (q) the result with column (a) whole dollars 1a Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, 0 leave this line blank and go to line 1b . **1b** Totals for all transactions reported on Form(s) 8949 0 with **Box A** checked 2 Totals for all transactions reported on Form(s) 8949 0 with **Box B** checked Totals for all transactions reported on Form(s) 8949 0 0 500,680 500.680 with **Box C** checked Short-term capital gain from installment sales from Form 6252, line 26 or 37. 4 Short-term capital gain or (loss) from like-kind exchanges from Form 8824 5 0) **6** Unused capital loss carryover (attach computation) 6 7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column h 7 500,680 Part II Long-Term Capital Gains and Losses—Assets Held More Than One Year See instructions for how to figure the amounts to enter on (g) Adjustments to gain (h) Gain or (loss) the lines below. or loss from Form(s) Subtract column (e) from Cost Proceeds 8949, Part II, line 2, column (d) and combine This form may be easier to complete if you round off cents to (or other basis) (sales price) column (q) the result with column (a) whole dollars 8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, 0 leave this line blank and go to line 8b 8b Totals for all transactions reported on Form(s) 8949 0 with **Box D** checked 9 Totals for all transactions reported on Form(s) 8949 0 with **Box E** checked Totals for all transactions reported on Form(s) 8949 10 1,344,638 0 0 1,344,638 with **Box F** checked 198,087 11 Enter gain from Form 4797, line 7 or 9. 11 **12** Long-term capital gain from installment sales from Form 6252, line 26 or 37 12 13 Long-term capital gain or (loss) from like-kind exchanges from Form 8824 13 Capital gain distributions (see instructions) 14 15 1,542,725 15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column h Summary of Parts I and II Part III 16 Enter excess of net short-term capital gain (line 7) over net long-term capital loss (line 15) 16 500,680 17 Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) 17 1,542,725

Note: If losses exceed gains, see Capital losses in the instructions.

2,043,405

Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the proper line on other returns .

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# Form **4626**

Department of the Treasury Internal Revenue Service

Name

#### **Alternative Minimum Tax—Corporations**

► Attach to the corporation's tax return.

▶ Go to www.irs.gov/Form4626 for instructions and the latest information.

OMB No. 1545-0123

2017

Employer identification number

THE MCKNIGHT FOUNDATION 41-0754835 Note: See the instructions to find out if the corporation is a small corporation exempt from the alternative minimum tax (AMT) under section 55(e). 1 1 532,219 2 Adjustments and preferences: Depreciation of post-1986 property . . . . . . . . . . . . . . . . . 2a (2,250)2b 2c Amortization of circulation expenditures (personal holding companies only) . . . 2d 2e 421 2f 2g Section 833(b) deduction (Blue Cross, Blue Shield, and similar type organizations only) 2h Tax shelter farm activities (personal service corporations only) . . . . . . . . . . . . . . . . . . 2i Passive activities (closely held corporations and personal service corporations only) . . . 2i i 2k k 21 Tax-exempt interest income from specified private activity bonds . . . . . 2m 2n (28,055)n 20 3,792 3 Pre-adjustment alternative minimum taxable income (AMTI). Combine lines 1 through 2o. 3 506.127 Adjusted current earnings (ACE) adjustment: ACE from line 10 of the ACE worksheet in the instructions . . . . . . . . . . . . 506,127 Subtract line 3 from line 4a. If line 3 exceeds line 4a. enter the difference as a 4b 0 0 Multiply line 4b by 75% (0.75). Enter the result as a positive amount . . . . 4c Enter the excess, if any, of the corporation's total increases in AMTI from prior year ACE adjustments over its total reductions in AMTI from prior year ACE adjustments. See instructions. Note: You must enter an amount on line 4d 4d ACE adjustment. • If line 4b is zero or more, enter the amount from line 4c 4e 0 • If line 4b is less than zero, enter the smaller of line 4c or line 4d as a negative amount 5 Combine lines 3 and 4e. If zero or less, stop here; the corporation does not owe any AMT . . . . 5 506,127 6 6 0 7 Alternative minimum taxable income. Subtract line 6 from line 5. If the corporation held a residual 7 506.127 8 Exemption phase-out (if line 7 is \$310,000 or more, skip lines 8a and 8b and enter -0- on line 8c): Subtract \$150,000 from line 7. If completing this line for a member of a controlled group, see instructions. If zero or less, enter -0-. . . . . . . . . . 0 0 Exemption. Subtract line 8b from \$40,000. If completing this line for a member of a controlled group, 8c 9 9 506.127 10 10 101,225 Alternative minimum tax foreign tax credit (AMTFTC). See instructions . . . . . . . . 11 11 12 12 101,225 180.954 13 Regular tax liability before applying all credits except the foreign tax credit . . . . . . . . . . 13 14 Alternative minimum tax. Subtract line 13 from line 12. If zero or less, enter -0-. Enter here and on 14 Form 1120, Schedule J, line 3, or the appropriate line of the corporation's income tax return . . . For Paperwork Reduction Act Notice, see separate instructions. Form **4626** (2017) Cat. No. 12955I

# 8949

Department of the Treasury

# Sales and Other Dispositions of Capital Assets

▶ Go to www.irs.gov/Form8949 for instructions and the latest information.

Attachment

Sequence No. 12A

OMB No. 1545-0074

Internal Revenue Service Name(s) shown on return

THE MCKNIGHT FOUNDATION

File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Social security number or taxpayer identification number 41-0754835

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

Part I

**Short-Term.** Transactions involving capital assets you held 1 year or less are short term. For long-term transactions, see page 2.

Note: You may aggregate all short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the totals directly on Schedule D, line 1a; you aren't required to report these transactions on Form 8949 (see instructions).

You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

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

| <ul><li>☐ (B) Short-term transactions re</li><li>✓ (C) Short-term transactions no</li></ul>   |   |   |          | <b>sn't</b> reported to tl  | he IRS  |   |  |
|---|---|---|----------|---|---|---|--|
| 1 (a) Description of property   | ( <b>b)</b> Date acquired (Mo., day, yr.) | (c)<br>Date sold or<br>disposed of<br>(Mo., day, yr.) | Proceeds | (e) Cost or other basis. See the <b>Note</b> below and see <i>Column</i> (e) in the separate instructions | Adjustment, i<br>If you enter an<br>enter a co<br>See the sep | (h) Gain or (loss). Subtract column (e) |  |
| (Example: 100 sh. XYZ Co.)  |   |   |          |   | (f)<br>Code(s) from<br>instructions                           | ( <b>g</b> )<br>Amount of<br>adjustment | from column (d) and<br>combine the result<br>with column (g) |
| SHORT-TERM GAIN/LOSS FROM INVESTMENTS   |   |   | 500,429  |   |   |   | 500,429  |
| SHORT-TERM ORDINARY GAIN/LOSS FROM INVESTMENTS  |   |   | 251      |   |   |   | 251  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
|   |   |   |          |   |   |   |  |
| 2 Totals. Add the amounts in columns<br>negative amounts). Enter each total<br>Schedule D, line 1b (if Box A above<br>above is checked), or line 3 (if Box C ab | here and incl<br>is checked), <b>lin</b>  | ude on your<br>e 2 (if Box B                          | 500,680  | 0   |   | 0                                       | 500,680  |

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

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Form 8949 (2017) Attachment Sequence No. **12A** Page **2** 

 $Name (s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side \\THE MCKNIGHT FOUNDATION$ 

Social security number or taxpayer identification number 41-0754835

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

#### Part II

**Long-Term.** Transactions involving capital assets you held more than 1 year are long term. For short-term transactions, see page 1.

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

You must check Box D, E, or F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need.

| (a) Description of property  | ( <b>b</b> ) Date acquired                      | (c)<br>Date sold or<br>disposed of<br>(Mo., day, yr.) |                                     | (e) Cost or other basis. See the <b>Note</b> below    | Adjustment, i<br>If you enter an<br>enter a co<br>See the sep | (h)<br>Gain or (loss).<br>Subtract column (e) |  |
|--|---|---|-------------------------------------|---|---|---|--|
| (Example: 100 sh. XYZ Co.)   | (Mo., day, yr.)                                 |   | (sales price)<br>(see instructions) | and see Column (e)<br>in the separate<br>instructions | (f)<br>Code(s) from<br>instructions                           | <b>(g)</b><br>Amount of<br>adjustment         | from column (d) and<br>combine the result<br>with column (g) |
| LONG-TERM GAIN/LOSS FROM INVESTMENTS   |   |   | 1,344,262                           |   |   |   | 1,344,262  |
| LONG-TERM ORDINARY GAIN/LOSS<br>FROM INVESTMENTS   |   |   | 376                                 |   |   |   | 376  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
|  |   |   |                                     |   |   |   |  |
| 2 Totals. Add the amounts in columns (an egative amounts). Enter each total he Schedule D, line 8b (if Box D above is above is checked), or line 10 (if Box F above is checked). | ere and include or<br>checked), <b>line 9</b> ( | n your<br>if <b>Box E</b>                             | 1,344,638                           | 0   |   | 0   | 1,344,638  |

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

Form **8949** (2017)

# Form **4797**

## **Sales of Business Property**

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

OMB No. 1545-0184

Department of the Treasury Internal Revenue Service

Name(s) shown on return

► Attach to your tax return. ► Go to www.irs.gov/Form4797 for instructions and the latest information.

Attachment Sequence No. 27

Identifying number

| THE      | MCKNIGHT FOUNDATION  |   |  |  |  |   | 41-075      | 54835   |
|----------|--|---|--|--|--|---|-------------|---|
| 1        | Enter the gross proceeds substitute statement) that  |   |  |  |  |   | 1           |   |
| Pa       | Sales or Exchan Than Casualty o  |   |  |  |  |   | sions       | From Other  |
| 2        | (a) Description of property  | (b) Date acquired (mo., day, yr.)                       | (c) Date sold (mo., day, yr.)                                    | (d) Gross<br>sales price   | (e) Depreciation<br>allowed or<br>allowable since<br>acquisition | (f) Cost or o<br>basis, plu<br>improvements<br>expense of s | is<br>s and | (g) Gain or (loss)<br>Subtract (f) from the<br>sum of (d) and (e) |
| 1231     | GAIN OR LOSS FROM PASSTHROUGH  |   |  | 198,087  |  |   |             | 198,087   |
| 3        | Gain, if any, from Form 4684   |   |  |  |  |   | 3           |   |
| 4<br>5   | Section 1231 gain from insta<br>Section 1231 gain or (loss) f  | rom like-kind exch                                      | anges from Form  | 8824   |  |   | 4<br>5<br>6 |   |
| 6<br>7   | Gain, if any, from line 32, from Combine lines 2 through 6. Partnerships (except elec  | Enter the gain or (le                                   | oss) here and on the rships) and S co                            | he appropriate line a  | s follows: the gain or (loss) f                                  | ollowing the  | 7           | 198,087   |
|          | instructions for Form 1065, Individuals, partners, S co line 7 on line 11 below and losses, or they were recap Schedule D filed with your recommendations. | rporation sharehod skip lines 8 and tured in an earlier | olders, and all oth<br>9. If line 7 is a ga<br>year, enter the g | ners. If line 7 is zero<br>ain and you didn't h<br>gain from line 7 as | or a loss, enter the a   | amount from<br>section 1231                                 |             |   |
| 8        | Nonrecaptured net section  |   | •  |  |  |   | 8           |   |
| 9        | Subtract line 8 from line 7. In 9 is more than zero, enter capital gain on the Schedule  | the amount from I<br>e D filed with your I              | ine 8 on line 12 b<br>return. See instruc                        | pelow and enter the stions   | gain from line 9 as  | a long-term   | 9           | 198,087   |
| 10       | ordinary Gains a Ordinary gains and losses n   |   |  |  | 1 year or less):   |   |             |   |
|          | Gramary game and record in   |   |  |  | . , , , , , , , , , , , , , , , , , , ,                          |   |             |   |
|          |  |   |  |  |  |   |             |   |
|          |  |   |  |  |  |   |             |   |
|          |  |   |  |  |  |   |             | 1   |
| 11<br>12 | Loss, if any, from line 7 Gain, if any, from line 7 or a   |   |  |  |  |   | 11<br>12    |   |
| 13       |  |   |  |  |  |   | 13          | 0   |
| 14       | Net gain or (loss) from Form   |   |  |  |  |   | 14          |   |
| 15       | Ordinary gain from installme   |   |  |  |  |   | 15          |   |
| 16       | Ordinary gain or (loss) from   |   |  |  |  |   | 16          |   |
| 17       | Combine lines 10 through 1   | 6   |  |  |  |   | 17          | 0   |
| 18       | For all except individual retu<br>and b below. For individual  | ·   |  |  | ne of your return and  | d skip lines a  |             |   |
| á        | a If the loss on line 11 includes  | a loss from Form  | 4684, line 35, colur   | nn (b)(ii), enter that pa  | art of the loss here. E  | nter the part   |             |   |
|          | of the loss from income-prod   | 0   | ,  | ,.   | •  |   |             |   |
|          | used as an employee on School<br>b Redetermine the gain or (los  | •   |  | ·  |  |   | 18a         |   |
|          | Paperwork Reduction Act N  | •   |  | iy, on line roa. Enter   |  | 0 <del>4</del> 0, III <i>I</i> E 14                         | 18b         | Form <b>4797</b> (2017  |
| LOI I    | raperwork neuuclion ACLN   | vuce, see separa  | เซ เทอแนบแบทจี.  |  | Cat. No. 13086I  |   |             | 101111 - 101 (2017  |

Form 4797 (2017) Page **2** 

| Pal       | Gain From Disposition of Property Und (see instructions)   | aer Se   | cτιons 1245, 12  | 250, 1252, 1  | 254,  | T                            |                    |                              |  |
|-----------|--|----------|------------------|---------------|-------|------------------------------|--------------------|------------------------------|--|
| 19        | (a) Description of section 1245, 1250, 1252, 1254, or 125  | 5 prope  | erty:            |               |       | (b) Date acq<br>(mo., day, y |                    | (c) Date sold (mo. day, yr.) |  |
| A         | -  |          |                  |               |       |                              |                    |                              |  |
| В         |  |          |                  |               |       |                              |                    |                              |  |
| <u>C</u>  |  |          |                  |               |       |                              |                    |                              |  |
| D         | ·<br>  |          |                  |               |       |                              |                    |                              |  |
|           | These columns relate to the properties on lines 19A through 19D  | ). ▶     | Property A       | Property      | В     | Property                     | C                  | Property D                   |  |
| 20        | Gross sales price (Note: See line 1 before completing.) .  | 20       |                  |               |       |                              |                    |                              |  |
| 21        | Cost or other basis plus expense of sale   | 21       |                  |               |       |                              |                    |                              |  |
| 22        | Depreciation (or depletion) allowed or allowable   | 22       |                  |               |       |                              |                    |                              |  |
| 23        | Adjusted basis. Subtract line 22 from line 21  | 23       |                  |               |       |                              |                    |                              |  |
| 24        | Total gain. Subtract line 23 from line 20  | 24       |                  |               |       |                              |                    |                              |  |
| 25        | If section 1245 property:  |          |                  |               |       |                              |                    |                              |  |
| а         | Depreciation allowed or allowable from line 22   | 25a      |                  |               |       |                              |                    |                              |  |
| b         | Enter the smaller of line 24 or 25a  | 25b      |                  |               |       |                              |                    |                              |  |
| 26        | If section 1250 property: If straight line depreciation was used, enter -0- on line 26g, except for a corporation subject to section 291.                                      |          |                  |               |       |                              |                    |                              |  |
|           | Additional depreciation after 1975. See instructions .   | 26a      |                  |               |       |                              |                    |                              |  |
| b         | Applicable percentage multiplied by the <b>smaller</b> of line 24 or line 26a. See instructions  | 26b      |                  |               |       |                              |                    |                              |  |
| С         | Subtract line 26a from line 24. If residential rental property <b>or</b> line 24 isn't more than line 26a, skip lines 26d and 26e  | 26c      |                  |               |       |                              |                    |                              |  |
| d         | Additional depreciation after 1969 and before 1976   | 26d      |                  |               |       |                              |                    |                              |  |
| е         | Enter the <b>smaller</b> of line 26c or 26d  | 26e      |                  |               |       |                              |                    |                              |  |
| f         | Section 291 amount (corporations only)   | 26f      |                  |               |       |                              |                    |                              |  |
|           | Add lines 26b, 26e, and 26f  | 26g      |                  |               |       |                              |                    |                              |  |
| 27        | If section 1252 property: Skip this section if you didn't dispose of farmland or if this form is being completed for a partnership (other than an electing large partnership). |          |                  |               |       |                              |                    |                              |  |
| а         | Soil, water, and land clearing expenses  | 27a      |                  |               |       |                              |                    |                              |  |
|           | Line 27a multiplied by applicable percentage. See instructions   | 27b      |                  |               |       |                              |                    |                              |  |
| С         | Enter the smaller of line 24 or 27b  | 27c      |                  |               |       |                              |                    |                              |  |
| 28        | If section 1254 property:  |          |                  |               |       |                              |                    |                              |  |
| а         | Intangible drilling and development costs, expenditures for development of mines and other natural deposits, mining exploration costs, and depletion. See instructions         | 28a      |                  |               |       |                              | ļ                  |                              |  |
| b         | Enter the smaller of line 24 or 28a  | 28b      |                  |               |       |                              |                    |                              |  |
| 29        | If section 1255 property:  |          |                  |               |       |                              |                    |                              |  |
| а         | Applicable percentage of payments excluded from  |          |                  |               |       |                              |                    |                              |  |
|           | income under section 126. See instructions   | 29a      |                  |               |       |                              |                    |                              |  |
|           | Enter the smaller of line 24 or 29a. See instructions .  | 29b      | through D throug | h line 20h h  | ofor  | acina to lin                 | 20                 |                              |  |
| Sun       | nmary of Part III Gains. Complete property colur   | IIIS A   | inrough D inroug | jn iine ∠9b b | eiore | going to iii                 | ie 30.             |                              |  |
| 30        | Total gains for all properties. Add property columns A thro  | ouah D   | line 24          |               |       |                              | 30                 |                              |  |
| 31        | Add property columns A through D, lines 25b, 26g, 27c, 2   | •        |                  |               |       |                              | 31                 |                              |  |
| 32        | Subtract line 31 from line 30. Enter the portion from casi   |          |                  |               |       |                              | 31                 |                              |  |
| <b>52</b> | •  | •        |                  | •             |       | •                            | 32                 |                              |  |
| Par       | Recapture Amounts Under Sections 17 (see instructions)   |          |                  |               |       |                              |                    |                              |  |
|           |  |          |                  |               |       |                              | (a) Section<br>179 |                              |  |
| 33        | Section 179 expense deduction or depreciation allowable  | in prior | vears.           |               | 33    |                              |                    |                              |  |
| 34        | Recomputed depreciation. See instructions  | p. 101   | ,                | · · ·         | 34    |                              |                    |                              |  |

Form **4797** (2017)

35

Recapture amount. Subtract line 34 from line 33. See the instructions for where to report

35

Department of the Treasury

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

Internal Revenue Service

Information furnished for the foreign partnership's tax year **JAN 01** , 2017, and ending DEC 31

OMB No. 1545-1668

Attachment Sequence No. **118** 

|   |   | filing this retu<br>HT FOUND |                                   | ·           | Filer's identifying number 41-0754835                |   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
|---|---|------------------------------|-----------------------------------|-------------|--|---|------------|--|-----------------------|--------------|-------------------|-----------|----------------------------------|---------------------|---------|---------|--------------|--|
| Filer's                                 | address (i  | f you are not                | filing this form with             | your tax re | eturn)   | A Catego  | ory of fil | er (se   | e Cateo               | gories o     |                   |           | tructions                        | and ch              | neck ap | olicabl | e box(es)):  |  |
|   |   |                              |                                   |             |  | B Filer's   | tax yoa    |  | inning                | JAN (        |                   | 17        |                                  | مائم م              | DEC 3   |         | 20 17        |  |
| С                                       | Filer's s   | hare of liabi                | ilities: Nonrecour                | se \$       |  | Qualified   |            |  |                       |              |                   | - 17      | , and end                        | er\$                | DLO     | , , ,   | 20 17        |  |
|   |   |                              |                                   |             | out not the parent                                   |   |            |  |                       |              |                   | parent    |                                  | Οι Ψ                |         |         |              |  |
|   | Name  | 7 4 1110111001               | or a correctionation              | a group b   | at not the parent                                    | nt, enter the following information about the parent: |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
|   | Address   |                              |                                   |             |  | Liit  |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
| E                                       | Check i   | if anv excep                 | ted specified for                 | eian finan  | ncial assets are re                                  | ported on   | this fo    | orm (s   | see ins               | structio     | ns) .             |           |                                  |                     |         |         | . П          |  |
| F                                       |   | , .                          | certain other part                |             |  |   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
|   |   | (1) Nama                     | •                                 | ,           | (2) Addres   |   |            |  | (2) Idon              | ntifying n   | umbor             |           | (4) Che                          | ck app              | licable | box(e   | s)           |  |
|   |   | <b>(1)</b> Name              |                                   |             | (2) Addres   | 5   |            | '  | (S) Iden              | itilyilig li | lulliber          | Cate      | gory 1                           | ory 1 Category 2 Co |         | Constr  | uctive owner |  |
|   |   |                              |                                   |             |  |   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
|   |   |                              |                                   |             |  |   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
|   |   |                              |                                   |             |  |   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
| G1                                      | Name a  | and address                  | of foreign partne                 | ership      | -011005 00501  |   | _          | 2(   | (a) EIN               | I (if any    | )                 |           |                                  |                     |         |         |              |  |
|   |   |                              | E, SUITE 210                      | URE OFF     | SHORE CREDIT   | FUND LE   | ,          |  |                       |              |                   | 98-1      | 285979                           |                     |         |         |              |  |
|   | WILMINGTON DELAWARE 19801   |                              |                                   |             |  |   |            | 2(   | <b>(b)</b> Ref        | ference      | ID numb           | oer (se   | e instr.)                        |                     |         |         |              |  |
|   |   |                              |                                   |             |  |   |            |  | _                     |              |                   | _         |                                  |                     |         |         |              |  |
|   |   |                              |                                   |             |  |   |            | 3  | Count                 | ry unde      | er whose          |           | INIZED<br>LANDS                  |                     |         |         |              |  |
| 4                                       | Date of   |                              | 5 Principal pla                   | oo of       | 6 Principal busin                                    | 2000  | 7 Dr       | incin  | al busi               | inocc        |                   |           |                                  |                     |         |         |              |  |
| 4                                       | 4 Date of 5 Principal place of business   |                              | activity code number              |             |  | tivity  |            | 11622  | 8a Functional currenc |              |                   |           | (see instr.)                     |                     |         |         |              |  |
|   | 02/12/2016 UNITED STATES  |                              | •                                 |             |  | ,<br>STIN   |            |  | USD                   |              |                   | 1.0000000 |                                  |                     |         |         |              |  |
| Н                                       |   |                              |                                   |             | ign partnership's                                    |   |            |  |                       |              |                   |           |                                  |                     | .00000  |         |              |  |
| 1                                       |   |                              |                                   |             | gent (if any) in the                                 |   | 2 (        | Chec   | k if the              | e foreia     | n partne          | rship n   | nust file                        | :                   |         |         |              |  |
|   | United  |                              | , ,                               |             | <i>y</i> - ( <i>y</i> ,                              |   |            |  | orm 10                | _            | Form              |           |                                  |                     | 1065 o  | 106     | 5-B          |  |
|   |   |                              | MENT, LLC, 5 M/<br>65, 20-8947290 | AXWELL      | DRIVE, SUITE 13                                      | 35,   |            | Servic   | ce Cent               |              | e Form 10         |           |                                  |                     |         |         |              |  |
| 3                                       |   |                              | of foreign partne                 | ership's a  | gent in country o                                    | f   |            |  |                       |              |                   |           | s) with custody of the books and |                     |         |         |              |  |
|   | •   | ation, if any                | NED. #0E0   IM                    |             | 207 202 1101 11                                      | ID 1101101  |            | records of the foreign partnership, and the location of such and records, if different |                       |              |                   |           |                                  | n books             |         |         |              |  |
|   |   |                              | 104, CAYMAN I                     |             | BOX 309, UGLAN                                       | ID HOUSE  | -,         |  |                       |              |                   | T 110     | - F.MAV                          | \\/ <u>\</u>        | DDIV    | г сі    | UTE          |  |
|   |   | ,                            | - , -                             |             |  |   |            |  |                       |              | GEMEN<br>, NY 120 |           | , S WAA                          | VVELI               | LDKIV   | E, 30   | JIIE         |  |
| 5                                       | Were a  | any special                  | allocations made                  | by the fo   | oreign partnership                                   | o?  |            | ▶ ☐ Yes ☑ No   |                       |              |                   |           |                                  |                     |         | No      |              |  |
| 6                                       | Enter   | the number                   | of Forms 8858                     | , Informa   | tion Return of U                                     | .S. Persor  | ns Witl    | s With Respect To Foreign Disregarded Entities,  |                       |              |                   |           |                                  |                     |         |         |              |  |
|   | attach  | ed to this re                | eturn (see instruc                | tions) .    |  |   |            |  |                       |              |                   |           |                                  | •                   |         |         |              |  |
| 7                                       | How is  | s this partne                | rship classified ι                | ınder the   | law of the countr                                    | y in which  | it is o    | rgani  | ized?                 | . •          | PARTI             | NERSH     | HP                               |                     |         |         |              |  |
| 8a                                      |   |                              |                                   | • .         | urtnership, or an intombined separate                |   | •          | _  |                       | ٠.           |                   |           |                                  |                     |         | s       | □No          |  |
| b                                       |   | o .                          | ., .,, .                          |             | eparate unit have a                                  |   | •          |  | . , . ,               | , , , , ,    | •                 |           |                                  |                     | Y€      | _       | No           |  |
| 9                                       | Does t  | this partners                | ship meet <b>both</b> o           | f the follo | wing requiremen                                      | ts?   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
|   | • The   | partnership'                 | 's total receipts f               | or the tax  | year were less th                                    | han \$250,0   | 000 an     | ıd   |                       |              |                   |           |                                  |                     | v.      |         | □ No         |  |
|   |   |                              |                                   |             | at the end of the                                    | tax year v  | was les    | ss tha   | an \$1 r              | million.     | Ì                 |           |                                  |                     | Y€      | :S _    | NO           |  |
|   | If "Yes   |                              | omplete Schedu                    |             | *  |   |            |  |                       |              | ,                 |           |                                  |                     |         |         |              |  |
| Sign H<br>Only If<br>Are Fil<br>This Fo | You<br>ing  | and belief, i                |                                   | nd complet  | I have examined thi<br>te. Declaration of prowledge. |   |            |  |                       |              |                   |           |                                  |                     |         |         |              |  |
| Separa                                  | itely   |                              |                                   |             |  |   |            |  |                       |              | L                 |           |                                  |                     |         |         |              |  |
| Your T                                  | and Not With Your Tax Signature of general partner or limited liability company |                              |                                   |             |  | member  |            |  |                       |              | Da                | ıte .     |                                  |                     |         |         |              |  |
| Return                                  |   |                              | reparer's name                    |             | Preparer's si  |   |            |  |                       |              | Date              |           | PTIN                             |                     |         |         |              |  |
| Paid                                    |   |                              |                                   |             |  | J   |            |  |                       |              | - 2               |           | Check if self-employed           |                     |         |         |              |  |
|   | oarer   | Firm's name                  | • •                               |             |  |   |            |  |                       |              |                   |           | self-employed Firm's EIN ►       |                     |         |         |              |  |
| Use                                     | Only  | Firm's addre                 |                                   |             |  |   |            |  |                       |              |                   |           | Phone                            |                     |         |         |              |  |

Form 8865 (2017) Page **2** 

| Sch   | edule    | A Constructive Ownership or box b, enter the name, add interest you constructively o | lress, and U.S. taxpayer ide       | ck thentify | ne boxes that applying number (if any | to the the of th | ne filer. If y<br>ne person | ou check<br>(s) whose         |
|---|----------|--|------------------------------------|-------------|---------------------------------------|--|-----------------------------|-------------------------------|
|   |          | a Owns a direct interest   |                                    | b           | Owns a constructive                   | intere   | st                          |                               |
|   |          | Name   | Address                            |             | Identifying number (if                | any)   | Check if foreign person     | Check if<br>direct<br>partner |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
| Sch   | edule    | A-1 Certain Partners of Foreign  | n Partnership (see instruction     | ons)        |                                       |  |                             |                               |
|   |          | Name   | Address                            |             | Identifying num                       | ber (if  | any)                        | Check if<br>foreign<br>person |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          | artnership have any other foreign perso  |                                    |             |                                       |  | Yes                         | ✓ No                          |
| Sch   | edule    | A-2 Affiliation Schedule. List a direct interest or indirectly o                     |                                    | mes         | tic) in which the fo                  | reign  | partnersh                   |                               |
|   |          | Name   | Address                            |             | EIN<br>(if any)                       |  | al ordinary<br>me or loss   | Check if foreign partnership  |
| (SEE S  | TATEME   | INT)   |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   |          |  |                                    |             |                                       |  |                             |                               |
| Sch   | edule    | B Income Statement—Trade   | or Business Income                 |             |                                       |  |                             |                               |
| Cauti   | on: Inc  | clude <b>only</b> trade or business income and                                       | expenses on lines 1a through 22    | belov       | v. See the instructions               | for m  | ore informat                | tion.                         |
|   |          |  |                                    |             |                                       |  |                             |                               |
|   | 1a<br>b  | Gross receipts or sales Less returns and allowances                                  | F                                  | 1a<br>1b    |                                       | 1c   |                             |                               |
|   | 2        | Cost of goods sold   |                                    | ID          |                                       | 2  |                             |                               |
| e   | 3        | Gross profit. Subtract line 2 from line  |                                    |             |                                       | 3  |                             |                               |
| соте  | 4        | Ordinary income (loss) from other par  |                                    |             |                                       | 4  |                             |                               |
| <u>n</u> c                                    | 5        | Net farm profit (loss) (attach Schedule  |                                    |             |                                       | 5  |                             |                               |
| _   | 6        | Net gain (loss) from Form 4797, Part I   |                                    |             |                                       | 6  |                             |                               |
|   | 7        | Other income (loss) (attach statement  | )                                  |             |                                       | 7  |                             |                               |
|   | 8        | Total income (loss). Combine lines 3   | through 7                          |             |                                       | 8  |                             |                               |
|   | 9        | Salaries and wages (other than to par  |                                    |             |                                       | 9  |                             |                               |
| ŝ   | 10       | Guaranteed payments to partners .  |                                    |             |                                       | 10   |                             |                               |
| tion  | 11       | Repairs and maintenance  |                                    |             |                                       | 11   |                             |                               |
| nita  | 12       | Bad debts  |                                    |             |                                       | 12   |                             |                               |
| o.<br>E                                       | 13       | Rent   |                                    |             |                                       | 13   |                             |                               |
| ns f  | 14       | Taxes and licenses   |                                    |             |                                       | 14   |                             |                               |
| Jotic   | 15       | Interest   |                                    |             |                                       | 15   |                             |                               |
| nstr  | 16a      | Depreciation (if required, attach Form   |                                    |             |                                       | 4.0  |                             |                               |
| ee i  | b        | Less depreciation reported elsewhere   |                                    |             |                                       | 16c  |                             |                               |
| Š   | 17<br>18 | Depletion ( <b>Do not</b> deduct oil and gas   |                                    |             |                                       | 17<br>18   |                             |                               |
| ion   | 19       | Retirement plans, etc  |                                    |             |                                       | 19   |                             |                               |
| ıct   | 20       | Other deductions (attach statement)  |                                    |             |                                       | 20   |                             |                               |
| Deductions (see instructions for limitations) | 20       | onioi deddenono (attaon statement)   |                                    | •           |                                       |  |                             |                               |
| ۵   | 21       | Total deductions. Add the amounts s  | shown in the far right column fo   | r line      | s 9 through 20                        | 21   |                             |                               |
|   | 22       | Ordinary husiness income (loss) from   | n trade or husiness activities. Su | ıhtrad      | et line 21 from line 8                | 22   |                             |                               |

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| Schedu                                    | ile K | Partners' Distributive Share Items   |        | Total amount |   |
|---|-------|--|--------|--------------|---|
|   | 1     | Ordinary business income (loss) (page 2, line 22)                                  | 1      |              |   |
|   | 2     | Net rental real estate income (loss) (attach Form 8825)                            | 2      |              |   |
|   | 3a    | Other gross rental income (loss)   |        |              |   |
|   | b     | Expenses from other rental activities (attach statement) 3b                        |        |              |   |
|   | С     | Other net rental income (loss). Subtract line 3b from line 3a                      | 3с     |              | • |
| (S  | 4     | Guaranteed payments  | 4      |              |   |
| Income (Loss)                             | 5     | Interest income  | 5      |              |   |
| 7   | 6     | Dividends: a Ordinary dividends  | 6a     |              |   |
| πe  |       | <b>b</b> Qualified dividends 6b  |        |              |   |
| 0   | 7     | Royalties  | 7      |              |   |
| <u>ĕ</u>                                  | 8     | Net short-term capital gain (loss) (attach Schedule D (Form 1065))                 | 8      |              |   |
|   | 9a    | Net long-term capital gain (loss) (attach Schedule D (Form 1065))                  | 9a     |              |   |
|   | b     | Collectibles (28%) gain (loss)   |        |              |   |
|   | С     | Unrecaptured section 1250 gain (attach statement) 9c                               |        |              |   |
|   | 10    | Net section 1231 gain (loss) (attach Form 4797)                                    | 10     |              |   |
|   | 11    | Other income (loss) (see instructions) Type ▶                                      | 11     |              |   |
| SL  | 12    | Section 179 deduction (attach Form 4562)   | 12     |              |   |
| <u>.</u>                                  | 13a   | Contributions  | 13a    |              |   |
| Deductions                                | b     | Investment interest expense  | 13b    |              |   |
| pe  | С     | Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶                             | 13c(2) |              |   |
|   | d     | Other deductions (see instructions) Type ▶   | 13d    |              |   |
| Self-<br>Employ-<br>ment                  | 14a   | Net earnings (loss) from self-employment   | 14a    |              |   |
| Self-<br>mploy<br>ment                    | b     | Gross farming or fishing income  | 14b    |              |   |
| <u></u>                                   | С     | Gross nonfarm income   | 14c    |              |   |
|   | 15a   | Low-income housing credit (section 42(j)(5))                                       | 15a    |              |   |
| Ø   | b     | Low-income housing credit (other)  | 15b    |              |   |
| di<br>E                                   | С     | Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)      | 15c    |              |   |
| Credits                                   | d     | Other rental real estate credits (see instructions) Type ▶                         | 15d    |              |   |
|   | е     | Other rental credits (see instructions)  Type ▶                                    | 15e    |              |   |
|   | f     | Other credits (see instructions)  Type ▶   | 15f    |              |   |
|   | 16a   | Name of country or U.S. possession ▶   |        |              |   |
| 2   | b     | Gross income from all sources  | 16b    |              | - |
| io  | С     | Gross income sourced at partner level  | 16c    |              |   |
| ansactions                                | ام ا  | Foreign gross income sourced at partnership level                                  | 106    |              |   |
| JSć                                       | d     | Passive category ► e General category ► f Other (attach statement) ►               | 16f    |              |   |
| <u>.</u>                                  | g     | Deductions allocated and apportioned at partner level  Interest expense ► h Other  | 16h    |              |   |
| n Tr                                      | 9     | Deductions allocated and apportioned at partnership level to foreign source income | 16h    |              | - |
| Foreign                                   | i     | Passive category ► j General category ► k Other (attach statement) ►               | 16k    |              |   |
| ore                                       | i     | Total foreign taxes (check one): ▶ ☐ Paid ☐ Accrued                                | 161    |              |   |
| ш   | m     | Reduction in taxes available for credit (attach statement)                         | 16m    |              |   |
|   | n     | Other foreign tax information (attach statement)                                   |        |              |   |
|   | 17a   | Post-1986 depreciation adjustment  | 17a    |              |   |
| Alternative<br>Minimum Tax<br>(AMT) Items | b     | Adjusted gain or loss  | 17b    |              |   |
| Alternative<br>Iinimum Ta<br>AMT) Items   | С     | Depletion (other than oil and gas)   | 17c    |              |   |
| err<br>III)                               | d     | Oil, gas, and geothermal properties—gross income                                   | 17d    |              |   |
| Airi                                      | е     | Oil, gas, and geothermal properties—deductions                                     | 17e    |              |   |
|   | f     | Other AMT items (attach statement)   | 17f    |              |   |
| <u></u>                                   | 18a   | Tax-exempt interest income   | 18a    |              |   |
| Other Information                         | b     | Other tax-exempt income  | 18b    |              |   |
| ma  | С     | Nondeductible expenses   | 18c    |              |   |
| Ö   | 19a   | Distributions of cash and marketable securities                                    | 19a    |              |   |
| <u>=</u>                                  | b     | Distributions of other property  | 19b    |              |   |
| er  | 20 a  | Investment income  | 20a    |              |   |
| Σŧ  | b     | Investment expenses  | 20b    |              |   |
|   | С     | Other items and amounts (attach statement)   |        |              |   |

Page **4** 

| Sche | hedule L Balance Sheets per Books. (Not required if Item H9, page 1, is answered "Yes.") |           |             |          |         |  |  |  |  |
|------|--|-----------|-------------|----------|---------|--|--|--|--|
|      |  | Beginning | of tax year | End of t | ax year |  |  |  |  |
|      | Assets   | (a)       | (b)         | (c)      | (d)     |  |  |  |  |
| 1    | Cash   |           |             |          |         |  |  |  |  |
| 2a   | Trade notes and accounts receivable  |           |             |          |         |  |  |  |  |
| b    | Less allowance for bad debts   |           |             |          |         |  |  |  |  |
| 3    | Inventories  |           |             |          |         |  |  |  |  |
| 4    | U.S. government obligations  |           |             |          |         |  |  |  |  |
| 5    | Tax-exempt securities  |           |             |          |         |  |  |  |  |
| 6    | Other current assets (attach statement)  |           |             |          |         |  |  |  |  |
| 7a   | Loans to partners (or persons related to   |           |             |          |         |  |  |  |  |
|      | partners)  |           |             |          |         |  |  |  |  |
| b    | Mortgage and real estate loans   |           |             |          |         |  |  |  |  |
| 8    | Other investments (attach statement)   |           |             |          |         |  |  |  |  |
| 9a   | Buildings and other depreciable assets   |           |             |          |         |  |  |  |  |
| b    | Less accumulated depreciation  |           |             |          |         |  |  |  |  |
| 10a  | Depletable assets  |           |             |          |         |  |  |  |  |
| b    | Less accumulated depletion   |           |             |          |         |  |  |  |  |
| 11   | Land (net of any amortization)   |           |             |          |         |  |  |  |  |
| 12a  | Intangible assets (amortizable only)   |           |             |          |         |  |  |  |  |
| b    | Less accumulated amortization  |           |             |          |         |  |  |  |  |
| 13   | Other assets (attach statement)  |           |             |          |         |  |  |  |  |
| 14   | Total assets   |           |             |          |         |  |  |  |  |
|      | Liabilities and Capital  |           |             |          |         |  |  |  |  |
| 15   | Accounts payable   |           |             |          |         |  |  |  |  |
| 16   | Mortgages, notes, bonds payable in less than 1 year                                      |           |             |          |         |  |  |  |  |
| 17   | Other current liabilities (attach statement) .   |           |             |          |         |  |  |  |  |
| 18   | All nonrecourse loans  |           |             |          |         |  |  |  |  |
| 19a  | Loans from partners (or persons related to partners)                                     |           |             |          |         |  |  |  |  |
| b    | Mortgages, notes, bonds payable in 1 year or more  |           |             |          |         |  |  |  |  |
| 20   | Other liabilities (attach statement)   |           |             |          |         |  |  |  |  |
| 21   | Partners' capital accounts   |           |             |          |         |  |  |  |  |
| 22   | Total liabilities and capital  |           |             |          |         |  |  |  |  |

Form **8865** (2017)

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|      | ( /  |                       |            |  | . age <b>-</b>                   |
|------|--|-----------------------|------------|--|----------------------------------|
| Sche | dule M Balance Sheets fo   | r Interest Allocation |            |  |                                  |
|      |  |                       |            | (a) Beginning of tax year  | <b>(b)</b><br>End of<br>tax year |
| 1    | Total U.S. assets  |                       |            |  |                                  |
| 2    | Total foreign assets:  |                       |            |  |                                  |
| а    | Passive category   |                       |            |  |                                  |
| b    | General category   |                       |            |  |                                  |
| С    | Other (attach statement)   |                       |            |  |                                  |
| Sch  | Reconciliation of Incanswered "Yes.")  | come (Loss) per Books | With Inc   | ome (Loss) per Return. (Not req                                      | uired if Item H9, page 1, is     |
|      | ,  |                       | 6 Ir       | ncome recorded on books this   |                                  |
| 1    | Net income (loss) per books .  |                       | 1          | ear not included on Schedule K,                                      |                                  |
| 2    | Income included on Schedule K,   |                       |            | nes 1 through 11 (itemize):  |                                  |
| -    | lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11 not recorded on books this year (itemize):                   |                       | a T        | ax-exempt interest \$  |                                  |
| 3    | Guaranteed payments (other   |                       | 1          | eductions included on Schedule<br>, lines 1 through 13d, and 16l not |                                  |
| Ü    | than health insurance)   |                       |            | harged against book income this                                      |                                  |
| 4    | Expenses recorded on books this year not included on Schedule K, lines 1 through 13d, and 16l (itemize): |                       | <b>a</b> D | ear (itemize):   |                                  |
| a    | Depreciation \$  |                       |            |  |                                  |
| b    | Travel and entertainment \$  |                       | -          | dd lines 6 and 7   |                                  |
| _    |  |                       |            | ncome (loss). Subtract line 8  |                                  |
|      | Add lines 1 through 4  | 10 11 1               | /h tr      | om line 5  | 1 (0 ( m)                        |
|      | edule M-2 Analysis of Partne   | rs' Capital Accounts. |            |  | nswered "Yes.")                  |
| 1    | Balance at beginning of year   |                       | <b>6</b> D | istributions: <b>a</b> Cash  |                                  |
| 2    | Capital contributed:   |                       |            | <b>b</b> Property  |                                  |
|      | <b>a</b> Cash  |                       | <b>7</b> C | other decreases (itemize):   |                                  |
|      | <b>b</b> Property  |                       |            |  |                                  |
| 3    | Net income (loss) per books .  |                       |            |  |                                  |
| 4    | Other increases (itemize):   |                       |            |  |                                  |
|      |  |                       | -          | dd lines 6 and 7   |                                  |
| 5    | Add lines 1 through 4  |                       | 1          | alance at end of year. Subtract                                      |                                  |

Form **8865** (2017)

Form 8865 (2017)

## Schedule N Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities

**Important:** Complete a separate Form 8865 and Schedule N for each controlled foreign partnership. Enter the totals for each type of transaction that occurred between the foreign partnership and the persons listed in columns (a) through (d).

|    | Transactions<br>of<br>foreign partnership  | (a) U.S. person filing this return | (b) Any domestic<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (c) Any other foreign<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (d) Any U.S. person with a<br>10% or more direct interest<br>in the controlled foreign<br>partnership (other than the<br>U.S. person filing this return) |
|----|--|------------------------------------|---|--|--|
| 1  | Sales of inventory   |                                    |   |  |  |
| 2  | Sales of property rights (patents, trademarks, etc.)   |                                    |   |  |  |
| 3  | Compensation received for technical, managerial, engineering, construction, or like services |                                    |   |  |  |
| 4  | Commissions received .   |                                    |   |  |  |
| 5  | Rents, royalties, and license fees received  |                                    |   |  |  |
| 6  | Distributions received   |                                    |   |  |  |
| 7  | Interest received  |                                    |   |  |  |
| 8  | Other  |                                    |   |  |  |
| 9  | Add lines 1 through 8  |                                    |   |  |  |
| 10 | Purchases of inventory .   |                                    |   |  |  |
| 11 | Purchases of tangible property other than inventory  |                                    |   |  |  |
| 12 | Purchases of property rights (patents, trademarks, etc.)                                     |                                    |   |  |  |
| 13 | Compensation paid for technical, managerial, engineering, construction, or like services     |                                    |   |  |  |
| 14 | Commissions paid   |                                    |   |  |  |
| 15 | Rents, royalties, and license fees paid  |                                    |   |  |  |
| 16 | Distributions paid   |                                    |   |  |  |
| 17 | Interest paid  |                                    |   |  |  |
| 18 | Other  |                                    |   |  |  |
| 19 | Add lines 10 through 18 .  |                                    |   |  |  |
| 20 | Amounts borrowed (enter the maximum loan balance during the year). See instructions          |                                    |   |  |  |
| 21 | Amounts loaned (enter the maximum loan balance during the year). See instructions            |                                    |   |  |  |

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#### SCHEDULE O (Form 8865)

Transfer of Property to a Foreign Partnership (under section 6038B)

Department of the Treasury Internal Revenue Service

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

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

OMB No. 1545-1668

2017

| Name of transferor  |  |  |                                 |                               |                            |  | Filer's identifying nu                     |   |
|---|--|--|---------------------------------|-------------------------------|----------------------------|--|--|---|
| THE MCKNIGHT FOUNDAT  | ION  |  |                                 | EIN /if ony                   | <b>A</b>                   |  | 41-07<br>Reference ID numbe                | 754835  |
| NEW ENERGY CAPITAL INF  | DV CLDI ICLI IDE UE  | ESHUDE UDENIT EI I   | NID I D                         | EIN (if any                   | )<br>98-12859 <sup>:</sup> | 70   | Reference ID numbe                         | r (see instructions)                            |
| 1a Is the partnersh 1.721(c)-1T(b)(1 b If "Yes," was the 2 Was any intang                   | nip a section 72<br>14)? See instruc<br>e gain deferral n<br>pible property to | 21(c) partnership<br>ctions<br>nethod applied to<br>ransferred consi | (as defined ) avoid the red     | <br>cognition o<br>cipated to | ary Regu f gain upo        | lations section                                      | on   |   |
|   |  | Inder Section 6  |                                 |                               |                            | (-)(-)   |  |   |
| Type of property  | (a)<br>Date of<br>transfer   | (b)<br>Number of item<br>transferred                                 | s Fair marl                     | ket value                     | Cost                       | (d)<br>or other<br>asis                              | (e)<br>Section 704(c)<br>allocation method | <b>(f)</b><br>Gain recognized<br>on transfer    |
| Cash  | VARIOUS  |  |                                 | 2,115,209                     |                            |  |  |   |
| Stock, notes receivable<br>and payable, and other<br>securities                             |  |  |                                 |                               |                            |  |  |   |
| Inventory   |  |  |                                 |                               |                            |  |  |   |
| Tangible<br>property<br>used in trade<br>or business  |  |  |                                 |                               |                            |  |  |   |
| Intangible<br>property<br>described in<br>section 197(f)(9)                                 |  |  |                                 |                               |                            |  |  |   |
| Intangible property,<br>other than intangible<br>property described in<br>section 197(f)(9) |  |  |                                 |                               |                            |  |  |   |
| Other<br>property   |  |  |                                 |                               |                            |  |  |   |
| <br>Totals  |  |  |                                 | 2,115,209                     |                            | 0  |  | 0   |
| 3 Enter the transf Supplemental Inform  |  | age interest in the d To Be Report                                   |                                 | o: (a) Befo                   | re the tra                 | nsfer 13.2640  | ) % (b) After the                          | transfer 10.3280 %                              |
| Part II Disposition   | ons Reportabl  | e Under Sectio   | n 6038B                         |                               |                            |  |  |   |
| (a) Type of property or   | (b)<br>Date of<br>riginal transfer   | (c)<br>Date of<br>disposition  | (d)<br>Manner of<br>disposition | Gain rec<br>by partr          | ognized                    | (f) Depreciation recapture recognized by partnership | (g)<br>Gain allocated<br>to partner        | (h) Depreciation recapture allocated to partner |
|   | nofor reports d  | on this cabed  | ulo aubicet t                   | a gain re-                    | ognitio:                   | under each!  | on 004(b/2) or                             |   |
|   |  | on this schedu   | -                               | -                             | ognition                   |  | <b>&gt;</b>                                | ☐ Yes ☑ No                                      |



Affiliation Schedule (continued)

| Name  | Address  | EIN (if any) | Total ordinary income or loss | Check if foreign partnership |
|---|--|--------------|-------------------------------|------------------------------|
| NECIC CAYMAN BLOCKER LLC (TAXED AS A CORPORATION) | 1521 CONCORD PIKE, SUITE 310, WILMINGTON, DELAWARE 19803 | 81-1498513   |                               |                              |

# 8865

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

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

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Information furnished for the foreign partnership's tax year beginning , 2017, and ending **DEC 31** 

OMB No. 1545-1668

Attachment Sequence No. 118

201

Filer's identifying number Name of person filing this return THE MCKNIGHT FOUNDATION 41-0754835 A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): Filer's address (if you are not filing this form with your tax return) 3 🗸 4 **JAN 01 DEC 31** 17 B Filer's tax year beginning 20 20 and ending С Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name FIN Address Ε Check if any excepted specified foreign financial assets are reported on this form (see instructions) F Information about certain other partners (see instructions) (4) Check applicable box(es) (2) Address (1) Name (3) Identifying number Category 2 | Constructive owner Category 1 Name and address of foreign partnership 2(a) EIN (if any) ORBIMED ASIA PARTNERS III, L.P. 98-1325964 601 LEXINGTON AVE, 54TH FLOOR 2(b) Reference ID number (see instr.) **NEW YORK NEW YORK 10022** 3 Country under whose laws organized **CAYMAN ISLANDS** Date of 5 Principal place of 6 Principal business 7 Principal business 8a Functional currency **8b** Exchange rate activity organization business activity code number (see instr.) 3/1/2017 **CAYMAN ISLANDS** 523900 **INVESTMENTS USD** н Provide the following information for the foreign partnership's tax year: Name, address, and identifying number of agent (if any) in the 2 Check if the foreign partnership must file: United States Form 1042 Form 8804 ✓ Form 1065 or 1065-B ORBIMED ASIA GP III, LP, 601 LEXINGTON AVENUE, 54TH FLOOR, NEW Service Center where Form 1065 or 1065-B is filed: YORK, NY 10022 OGDEN, UT Name and address of foreign partnership's agent in country of 4 Name and address of person(s) with custody of the books and organization, if any records of the foreign partnership, and the location of such books and records, if different C/O INTERTRUST CORPORATE SERVICES (CAYMAN) LIMITED, 190 ELGIN AVENUE, GRAND CAYMAN, GEORGE TOWN, KY1-1-9005, CAYMAN C/O INTERTRUST CORPORATE SERVICES (CAYMAN) LIMITED, 190 ELGIN **ISLANDS** AVENUE, GRAND CAYMAN, GEORGE TOWN, KY-1 1-9005, CAYMAN ISLANDS 5 Were any special allocations made by the foreign partnership? 6 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect To Foreign Disregarded Entities, 7 How is this partnership classified under the law of the country in which it is organized? ▶ EXEMPTED LIMITED PARTNERSHIP Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that is a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 8b. ▶ \_\_ Yes If "Yes," does the separate unit or combined separate unit have a dual consolidated loss as defined in Reg. 1.1503(d)-1(b)(5)(ii)? ▶ Yes h 9 Does this partnership meet both of the following requirements? • The partnership's total receipts for the tax year were less than \$250,000 and Yes • The value of the partnership's total assets at the end of the tax year was less than \$1 million. If "Yes," do not complete Schedules L, M-1, and M-2. Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge Sign Here Only If You and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on al Are Filing information of which preparer has any knowledge. This Form Separately and Not With Your Tax Signature of general partner or limited liability company member Date Return. Preparer's signature Print/Type preparer's name Date PTIN Check L if Paid self-employed Preparer Firm's name Firm's EIN ▶ Use Only Firm's address ▶ Phone no.

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| Sch   | edule      | Constructive Ownership o<br>box b, enter the name, add<br>interest you constructively o | lress, and U.S. taxpayer ide            |         |                            |          |                           |                                    |
|---|------------|---|---|---------|----------------------------|----------|---------------------------|------------------------------------|
|   |            | a   |   | b       | Owns a constructive        | intere   | st                        |                                    |
|   |            | Name  | Address                                 |         | Identifying number (if     | any)     | Check if foreign person   | Check if direct partner            |
|   |            |   |   |         |                            |          |                           |                                    |
| Sch   | edule      | A-1 Certain Partners of Foreig  | <br><b>n Partnership</b> (see instructi | ons)    |                            |          |                           |                                    |
|   |            | Name  | Address                                 |         | Identifying num            | nber (if | any)                      | Check if<br>foreign<br>person      |
|   |            |   |   |         |                            |          |                           |                                    |
| Door  | tho no     | artnership have any other foreign perso   | un as a direct partner?                 |         |                            |          | <b></b>                   |                                    |
|   | edule      |   | · · · · · · · · · · · · · · · · · · ·   |         | tic) in which the fo       |          | <u>Yes</u><br>partnersh   | <mark>∐ No</mark><br>ip owns a     |
|   |            | direct interest or indirectly o   |   |         | ,                          |          | •                         |                                    |
|   |            | Name  | Address                                 |         | EIN<br>(if any)            |          | al ordinary<br>me or loss | Check if<br>foreign<br>partnership |
|   |            |   |   |         |                            |          |                           |                                    |
|   |            |   |   |         |                            |          |                           |                                    |
|   |            |   |   |         |                            |          |                           |                                    |
| Cob   | مابيام     | B Income Statement—Trade  | or Pusiness Income                      |         |                            |          |                           |                                    |
|   | edule      | clude only trade or business income and   |   | helov   | v See the instructions     | for me   | ore informa               | tion                               |
| Oddi  |            | adde crity trade or business income and   | expenses on lines to through 22         | DOIOV   | v. GGG trio irioti dotione | 101 111  |                           |                                    |
|   | 1a         | Gross receipts or sales   |   | 1a      |                            |          |                           |                                    |
|   | b          | Less returns and allowances   |   | 1b      |                            | 1c       |                           |                                    |
| 4   | 2          | Cost of goods sold  |   |         |                            | 2        |                           |                                    |
| come  | 3          | Gross profit. Subtract line 2 from line   |   |         |                            | 3        |                           |                                    |
| 0   | 4          | Ordinary income (loss) from other par   |   |         |                            | 4        |                           |                                    |
| 드   | 5          | Net farm profit (loss) (attach Schedule   |   |         |                            | 5        |                           |                                    |
|   | 6          | Net gain (loss) from Form 4797, Part I<br>Other income (loss) (attach statement         |   |         |                            | 7        |                           |                                    |
|   | ı <i>'</i> | other moome (1033) (attach statement  | ,,                                      |         |                            |          |                           |                                    |
|   | 8          | Total income (loss). Combine lines 3  | through 7                               |         |                            | 8        |                           |                                    |
|   | 9          | Salaries and wages (other than to par   | tners) (less employment credits         | s) .    |                            | 9        |                           |                                    |
| (SI   | 10         | Guaranteed payments to partners .   |   |         |                            | 10       |                           |                                    |
| atior   | 11         | Repairs and maintenance   |   |         |                            | 11       |                           |                                    |
| imit  | 12         | Bad debts   |   |         |                            | 12       |                           |                                    |
| for   | 13         | Rent  |   |         |                            | 13       |                           |                                    |
| ons   | 14<br>15   | Taxes and licenses  |   |         |                            | 14       |                           |                                    |
| ruct  | 16a        | Depreciation (if required, attach Form  |   | 16a     | l .                        | 13       |                           |                                    |
| inst  | b          | Less depreciation reported elsewhere  | -                                       | 16b     |                            | 16c      |                           |                                    |
| ees)  | 17         | Depletion ( <b>Do not</b> deduct oil and gas  |   |         |                            | 17       |                           |                                    |
| us  | 18         | Retirement plans, etc   |   |         |                            | 18       |                           |                                    |
| ţi  | 19         | Employee benefit programs   |   |         |                            | 19       |                           |                                    |
| <u>n</u>                                      | 20         | Other deductions (attach statement)   |   |         |                            | 20       |                           |                                    |
| Deductions (see instructions for limitations) | 21         | Total deductions. Add the amounts s   | shown in the far right column fo        | or line | s 9 through 20             | 21       |                           |                                    |
|   | 22         | Ordinary business income (loss) from  | n trade or business activities. S       | ubtra   | ct line 21 from line 8     | 22       |                           |                                    |

Form **8865** (2017)

Page 3

| Schedu                                    | ile K | Partners' Distributive Share Items   |        | Total amount |   |
|---|-------|--|--------|--------------|---|
|   | 1     | Ordinary business income (loss) (page 2, line 22)                                  | 1      |              |   |
|   | 2     | Net rental real estate income (loss) (attach Form 8825)                            | 2      |              |   |
|   | 3a    | Other gross rental income (loss)   |        |              |   |
|   | b     | Expenses from other rental activities (attach statement) 3b                        |        |              |   |
|   | С     | Other net rental income (loss). Subtract line 3b from line 3a                      | 3с     |              | • |
| (S  | 4     | Guaranteed payments  | 4      |              |   |
| Income (Loss)                             | 5     | Interest income  | 5      |              |   |
| 7   | 6     | Dividends: a Ordinary dividends  | 6a     |              |   |
| πe  |       | <b>b</b> Qualified dividends 6b  |        |              |   |
| 0   | 7     | Royalties  | 7      |              |   |
| <u>ĕ</u>                                  | 8     | Net short-term capital gain (loss) (attach Schedule D (Form 1065))                 | 8      |              |   |
|   | 9a    | Net long-term capital gain (loss) (attach Schedule D (Form 1065))                  | 9a     |              |   |
|   | b     | Collectibles (28%) gain (loss)   |        |              |   |
|   | С     | Unrecaptured section 1250 gain (attach statement) 9c                               |        |              |   |
|   | 10    | Net section 1231 gain (loss) (attach Form 4797)                                    | 10     |              |   |
|   | 11    | Other income (loss) (see instructions) Type ▶                                      | 11     |              |   |
| SL  | 12    | Section 179 deduction (attach Form 4562)   | 12     |              |   |
| <u>.</u>                                  | 13a   | Contributions  | 13a    |              |   |
| Deductions                                | b     | Investment interest expense  | 13b    |              |   |
| pe  | С     | Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶                             | 13c(2) |              |   |
|   | d     | Other deductions (see instructions) Type ▶   | 13d    |              |   |
| Self-<br>Employ-<br>ment                  | 14a   | Net earnings (loss) from self-employment   | 14a    |              |   |
| Self-<br>mploy<br>ment                    | b     | Gross farming or fishing income  | 14b    |              |   |
| <u></u>                                   | С     | Gross nonfarm income   | 14c    |              |   |
|   | 15a   | Low-income housing credit (section 42(j)(5))                                       | 15a    |              |   |
| Ø   | b     | Low-income housing credit (other)  | 15b    |              |   |
| di<br>E                                   | С     | Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)      | 15c    |              |   |
| Credits                                   | d     | Other rental real estate credits (see instructions) Type ▶                         | 15d    |              |   |
|   | е     | Other rental credits (see instructions)  Type ▶                                    | 15e    |              |   |
|   | f     | Other credits (see instructions)  Type ▶   | 15f    |              |   |
|   | 16a   | Name of country or U.S. possession ▶   |        |              |   |
| S   | b     | Gross income from all sources  | 16b    |              | - |
| io  | С     | Gross income sourced at partner level  | 16c    |              |   |
| ansactions                                | ام ا  | Foreign gross income sourced at partnership level                                  | 106    |              |   |
| JSć                                       | d     | Passive category ► e General category ► f Other (attach statement) ►               | 16f    |              |   |
| <u>.</u>                                  | g     | Deductions allocated and apportioned at partner level  Interest expense ► h Other  | 16h    |              |   |
| n Tr                                      | 9     | Deductions allocated and apportioned at partnership level to foreign source income | 16h    |              | - |
| Foreign                                   | i     | Passive category ► j General category ► k Other (attach statement) ►               | 16k    |              |   |
| ore                                       | i     | Total foreign taxes (check one): ▶ ☐ Paid ☐ Accrued                                | 161    |              |   |
| ш   | m     | Reduction in taxes available for credit (attach statement)                         | 16m    |              |   |
|   | n     | Other foreign tax information (attach statement)                                   |        |              |   |
|   | 17a   | Post-1986 depreciation adjustment  | 17a    |              |   |
| Alternative<br>Minimum Tax<br>(AMT) Items | b     | Adjusted gain or loss  | 17b    |              |   |
| Alternative<br>Iinimum Ta<br>AMT) Items   | С     | Depletion (other than oil and gas)   | 17c    |              |   |
| err<br>III)                               | d     | Oil, gas, and geothermal properties—gross income                                   | 17d    |              |   |
| Airi                                      | е     | Oil, gas, and geothermal properties—deductions                                     | 17e    |              |   |
|   | f     | Other AMT items (attach statement)   | 17f    |              |   |
| <u></u>                                   | 18a   | Tax-exempt interest income   | 18a    |              |   |
| Other Information                         | b     | Other tax-exempt income  | 18b    |              |   |
| ma  | С     | Nondeductible expenses   | 18c    |              |   |
| Ö   | 19a   | Distributions of cash and marketable securities                                    | 19a    |              |   |
| <u>=</u>                                  | b     | Distributions of other property  | 19b    |              |   |
| er  | 20 a  | Investment income  | 20a    |              |   |
| Σŧ  | b     | Investment expenses  | 20b    |              |   |
|   | С     | Other items and amounts (attach statement)   |        |              |   |

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| Sche | dule L Balance Sheets per Books. (No                 | t required if Item I | H9, page 1, is ansv | wered "Yes.") |         |
|------|--|----------------------|---------------------|---------------|---------|
|      |  | Beginning            | of tax year         | End of t      | ax year |
|      | Assets   | (a)                  | (b)                 | (c)           | (d)     |
| 1    | Cash   |                      |                     |               |         |
| 2a   | Trade notes and accounts receivable                  |                      |                     |               |         |
| b    | Less allowance for bad debts                         |                      |                     |               |         |
| 3    | Inventories  |                      |                     |               |         |
| 4    | U.S. government obligations                          |                      |                     |               |         |
| 5    | Tax-exempt securities                                |                      |                     |               |         |
| 6    | Other current assets (attach statement)              |                      |                     |               |         |
| 7a   | Loans to partners (or persons related to             |                      |                     |               |         |
|      | partners)  |                      |                     |               |         |
| b    | 3.3  |                      |                     |               |         |
| 8    | Other investments (attach statement)                 |                      |                     |               |         |
| 9a   | Buildings and other depreciable assets               |                      |                     |               |         |
| b    | Less accumulated depreciation                        |                      |                     |               |         |
| 10a  | Depletable assets                                    |                      |                     |               |         |
| b    | Less accumulated depletion                           |                      |                     |               |         |
| 11   | Land (net of any amortization)                       |                      |                     |               |         |
| 12a  | Intangible assets (amortizable only)                 |                      |                     |               |         |
| b    | Less accumulated amortization                        |                      |                     |               |         |
| 13   | Other assets (attach statement)                      |                      |                     |               |         |
| 14   | Total assets   |                      |                     |               |         |
|      | Liabilities and Capital                              |                      |                     |               |         |
| 15   | Accounts payable                                     |                      |                     |               |         |
| 16   | Mortgages, notes, bonds payable in less than 1 year  |                      |                     |               |         |
| 17   | Other current liabilities (attach statement) .       |                      |                     |               |         |
| 18   | All nonrecourse loans                                |                      |                     |               |         |
| 19a  | Loans from partners (or persons related to partners) |                      |                     |               |         |
| b    | Mortgages, notes, bonds payable in 1 year or more    |                      |                     |               |         |
| 20   | Other liabilities (attach statement)                 |                      |                     |               |         |
| 21   | Partners' capital accounts                           |                      |                     |               |         |
| 22   | Total liabilities and capital                        |                      |                     |               |         |

Form 8865 (2017) Page **5** 

| Sche | dule M Balance Sheets for Interest A      | llocation   |              |                                 |                                  |          |
|------|---|-------------|--------------|---------------------------------|----------------------------------|----------|
|      |   |             |              | (a)<br>Beginning of<br>tax year | <b>(b)</b><br>End of<br>tax year |          |
| 1    | Total U.S. assets                         |             |              |                                 |                                  |          |
| 2    | Total foreign assets:                     |             |              |                                 |                                  |          |
| а    | Passive category                          |             |              |                                 |                                  |          |
| b    | General category                          |             |              |                                 |                                  |          |
| С    | Other (attach statement)                  |             |              |                                 |                                  |          |
| Sche | edule M-1 Reconciliation of Income (Loss) | per Books V | Vith Incon   | ne (Loss) per Return. (Not requ | ired if Item H9, page            | 1, is    |
|      | answered "Yes.")                          | •           |              |                                 | 71 0                             |          |
|      |   |             | 6 Inc        | ome recorded on books this      |                                  |          |
| 1    | Net income (loss) per books .             |             |              | r not included on Schedule K,   |                                  |          |
| 2    | Income included on Schedule K,            |             | line         | s 1 through 11 (itemize):       |                                  |          |
|      | lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,      |             | <b>a</b> Tax | -exempt interest \$             |                                  |          |
|      | and 11 not recorded on books              |             |              |                                 |                                  |          |
|      | this year (itemize):                      |             | 7 Dec        | luctions included on Schedule   |                                  |          |
| 3    | Guaranteed payments (other                |             | - 200        | ines 1 through 13d, and 16l not |                                  |          |
|      | than health insurance)                    |             |              | rged against book income this   |                                  |          |
| 4    | Expenses recorded on books                |             |              | r (itemize):                    |                                  |          |
| 7    | this year not included on                 |             |              | preciation \$                   |                                  |          |
|      | Schedule K, lines 1 through               |             |              |                                 |                                  |          |
|      | 13d, and 16l (itemize):                   |             |              |                                 |                                  |          |
| а    | Depreciation \$                           |             |              |                                 |                                  |          |
| b    | Travel and entertainment \$               |             | 8 Add        | d lines 6 and 7                 |                                  |          |
|      | · · · · · · · · · · · · · · · · · · ·     |             |              | ome (loss). Subtract line 8     |                                  |          |
| 5    | Add lines 1 through 4                     |             |              | n line 5                        |                                  |          |
| Sche | edule M-2 Analysis of Partners' Capital   | Accounts.   | (Not requ    | ired if Item H9, page 1, is an  | swered "Yes.")                   |          |
| 1    | Balance at beginning of year              |             |              | tributions: <b>a</b> Cash       | ,                                |          |
| 2    | Capital contributed:                      |             |              | <b>b</b> Property               |                                  |          |
|      | <b>a</b> Cash                             |             | <b>7</b> Oth | er decreases (itemize):         |                                  |          |
|      | <b>b</b> Property                         |             |              |                                 |                                  |          |
| 3    | Net income (loss) per books .             |             |              |                                 |                                  |          |
| 4    | Other increases (itemize):                |             |              |                                 |                                  |          |
| •    |   | 1           |              | d lines 6 and 7                 |                                  | $\vdash$ |
|      |   |             |              | ance at end of year. Subtract   |                                  | $\vdash$ |
| 5    | Add lines 1 through 4                     |             |              | 8 from line 5                   |                                  |          |

Form 8865 (2017)

### Schedule N Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities

**Important:** Complete a separate Form 8865 and Schedule N for each controlled foreign partnership. Enter the totals for each type of transaction that occurred between the foreign partnership and the persons listed in columns (a) through (d).

|    | Transactions<br>of<br>foreign partnership  | (a) U.S. person filing this return | (b) Any domestic<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (c) Any other foreign<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (d) Any U.S. person with a<br>10% or more direct interest<br>in the controlled foreign<br>partnership (other than the<br>U.S. person filing this return) |
|----|--|------------------------------------|---|--|--|
| 1  | Sales of inventory   |                                    |   |  |  |
| 2  | Sales of property rights (patents, trademarks, etc.)   |                                    |   |  |  |
| 3  | Compensation received for technical, managerial, engineering, construction, or like services |                                    |   |  |  |
| 4  | Commissions received .   |                                    |   |  |  |
| 5  | Rents, royalties, and license fees received  |                                    |   |  |  |
| 6  | Distributions received   |                                    |   |  |  |
| 7  | Interest received  |                                    |   |  |  |
| 8  | Other  |                                    |   |  |  |
| 9  | Add lines 1 through 8  |                                    |   |  |  |
| 10 | Purchases of inventory .   |                                    |   |  |  |
| 11 | Purchases of tangible property other than inventory  |                                    |   |  |  |
| 12 | Purchases of property rights (patents, trademarks, etc.)                                     |                                    |   |  |  |
| 13 | Compensation paid for technical, managerial, engineering, construction, or like services     |                                    |   |  |  |
| 14 | Commissions paid   |                                    |   |  |  |
| 15 | Rents, royalties, and license fees paid  |                                    |   |  |  |
| 16 | Distributions paid   |                                    |   |  |  |
| 17 | Interest paid  |                                    |   |  |  |
| 18 | Other  |                                    |   |  |  |
| 19 | Add lines 10 through 18 .  |                                    |   |  |  |
| 20 | Amounts borrowed (enter the maximum loan balance during the year). See instructions          |                                    |   |  |  |
| 21 | Amounts loaned (enter the maximum loan balance during the year). See instructions            |                                    |   |  |  |

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#### SCHEDULE O (Form 8865)

## Transfer of Property to a Foreign Partnership (under section 6038B)

Department of the Treasury Internal Revenue Service ► Attach to Form 8865. See Instructions for Form 8865.

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

OMB No. 1545-1668

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|---|--|---------------------------------------|---------------------------------------|-----------------------------------|--|--|--|--|--|
| Name of transferor  |  |                                       |                                       |                                   |  | Filer's identifying nur                    | nber   |  |  |
| THE MCKNIGHT FOUNDAT  | TION   |                                       |                                       |                                   |  | 41-07                                      | 41-0754835<br>Ference ID number (see instructions) |  |  |
| Name of foreign partnership   |  |                                       |                                       | EIN (if any)                      |  | Reference ID number                        | r (see instructions)                               |  |  |
| ORBIMED ASIA PARTNERS   |  |                                       |                                       |                                   | -1325964                                   |  |  |  |  |
| 2 Was any intan   | (14)? See instr<br>ne gain deferra<br>gible property | ructions method applie transferred co | ed to avoid the reconsidered or antic | ognition of gasipated to be       | ain upon the contrib<br>at the time of the | oution of property? e transfer or at any   | ☐ Yes ☑ No ☐ Yes ☐ No                              |  |  |
|   |  |                                       |                                       | itions section                    | n 1.482-7(c)(1)? .                         |  | ☐ Yes ☑ No   |  |  |
| Part I Transfer   | s Reportable   | Under Section                         | on 6038B                              |                                   |  |  |  |  |  |
| Type of property  | (a) Date of transfer                                 | (b)<br>Number of<br>transfer          |                                       | et value                          | (d)<br>Cost or other<br>basis              | (e)<br>Section 704(c)<br>allocation method | <b>(f)</b><br>Gain recognized<br>on transfer       |  |  |
| Cash  | VARIOUS  |                                       |                                       | 1,288,000                         |  |  |  |  |  |
| Stock, notes receivable and payable, and other securities                                   |  |                                       |                                       |                                   |  |  |  |  |  |
| Inventory   |  |                                       |                                       |                                   |  |  |  |  |  |
| Tangible<br>property<br>used in trade<br>or business  |  |                                       |                                       |                                   |  |  |  |  |  |
| Intangible<br>property<br>described in<br>section 197(f)(9)                                 |  |                                       |                                       |                                   |  |  |  |  |  |
| Intangible property,<br>other than intangible<br>property described in<br>section 197(f)(9) |  |                                       |                                       |                                   |  |  |  |  |  |
| Other<br>property   |  |                                       |                                       |                                   |  |  |  |  |  |
| Totals  |  |                                       |                                       | 1,288,000                         | 0  |  | 0  |  |  |
|   | sferor's percer                                      | ntage interest i                      | in the partnership                    |                                   |  | 0 % (b) After the                          | transfer 0.9095 %                                  |  |  |
| Supplemental Inforn   |  |                                       |                                       |                                   |  |  |  |  |  |
| Part II Dispositi   | ions Reporta   | ble Under Sec                         | ction 6038B                           |                                   |  |  |  |  |  |
| (a) Type of property  | (b)<br>Date of<br>original transfer                  | (c) Date of disposition               | (d)<br>Manner of<br>disposition       | (e)<br>Gain recogn<br>by partners |  | Gain allocated to partner                  | (h) Depreciation recapture allocated to partner    |  |  |
|   |  |                                       |                                       |                                   |  |  | +  |  |  |
|   |  |                                       |                                       |                                   |  |  |  |  |  |
|   |  |                                       |                                       |                                   |  |  |  |  |  |
| Bany tr   | ansfer reporte                                       | ed on this sch                        | nedule subject to                     | gain recog                        | nition under sect                          | <br>ion_904(f)(3)_or                       |  |  |  |
|   |  |                                       |                                       | -                                 | · · · · · ·                                |  | ☐ Yes ☐ No   |  |  |

## 8865

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

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

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Information furnished for the foreign partnership's tax year beginning , 2017, and ending **DEC 31** 

OMB No. 1545-1668

Attachment Sequence No. 118

Filer's identifying number Name of person filing this return THE MCKNIGHT FOUNDATION 41-0754835 A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): Filer's address (if you are not filing this form with your tax return) 3 🗸 4 **JAN 01 DEC 31** 17 B Filer's tax year beginning 20 20 and ending С Filer's share of liabilities: Nonrecourse \$ 1,425 Qualified nonrecourse financing \$ Other \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Ε Check if any excepted specified foreign financial assets are reported on this form (see instructions) F Information about certain other partners (see instructions) (4) Check applicable box(es) (2) Address (1) Name (3) Identifying number Category 2 | Constructive owner Category 1 Name and address of foreign partnership 2(a) EIN (if any) PANTHEON EUROPE FUND VI, LP 98-0573774 DOREY COURT ADMIRAL PARK FIRST FLOOR 2(b) Reference ID number (see instr.) ST. PETER PORT GY1 6HJ **GUERNSEY** 3 Country under whose laws organized UNITED KINGDOM (ENGLAND, NORTHERN IRELAND, SCOTLAND AND WALES) 6 Principal business Date of 5 Principal place of 7 Principal business 8a Functional currency 8b Exchange rate activity organization business activity code number (see instr.) 07/12/2007 **UNITED KINGDOM** 523900 **INVESTMENTS EUROS** \$1 = €.8880498 Provide the following information for the foreign partnership's tax year: н Name, address, and identifying number of agent (if any) in the 2 Check if the foreign partnership must file: United States Form 8804 ✓ Form 1065 or 1065-B **NONE** Service Center where Form 1065 or 1065-B is filed: F-FILE 4 Name and address of person(s) with custody of the books and Name and address of foreign partnership's agent in country of organization, if any records of the foreign partnership, and the location of such books and records, if different **NONE** NONE 5 Were any special allocations made by the foreign partnership? . . . . . . . . . . . . . . . . 6 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect To Foreign Disregarded Entities 7 How is this partnership classified under the law of the country in which it is organized? PARTNERSHIP Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that is a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 8b. ▶ \_\_ Yes If "Yes," does the separate unit or combined separate unit have a dual consolidated loss as defined in Reg. 1.1503(d)-1(b)(5)(ii)? ▶ Yes h 9 Does this partnership meet both of the following requirements? • The partnership's total receipts for the tax year were less than \$250,000 and • The value of the partnership's total assets at the end of the tax year was less than \$1 million. If "Yes," do not complete Schedules L, M-1, and M-2. Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge Sign Here Only If You and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on al Are Filing information of which preparer has any knowledge. This Form Separately and Not With Your Tax Signature of general partner or limited liability company member Date Return. Print/Type preparer's name Preparer's signature Date PTIN Check L if Paid self-employed Preparer Firm's EIN ▶ Firm's name Use Only

Phone no.

Firm's address ▶

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| Sch   | edule    | A Constructive Ownership or box b, enter the name, add interest you constructively o | lress, and U.S. taxpayer ide      | eck the  | ne boxes that apply<br>ring number (if any | to the the of th | ne filer. If y<br>ne person | ou check<br>(s) whose         |
|---|----------|--|-----------------------------------|----------|--|--|-----------------------------|-------------------------------|
|   |          | a Owns a direct interest   |                                   | b        | Owns a constructive                        | intere   | st                          |                               |
|   |          | Name   | Address                           |          | Identifying number (if                     | any)   | Check if foreign person     | Check if<br>direct<br>partner |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
| Sch   | edule    | A-1 Certain Partners of Foreign  | n Partnership (see instructi      | ons)     |  |  |                             |                               |
|   |          | Name   | Address                           |          | Identifying num                            | ber (if  | any)                        | Check if<br>foreign<br>person |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          | artnership have any other foreign perso  |                                   |          |  |  | Yes                         | ☐ No                          |
| Sch   | edule    | A-2 Affiliation Schedule. List a direct interest or indirectly or                    |                                   | omes     | stic) in which the fo                      | reign  | partnersh                   |                               |
|   |          | Name   | Address                           |          | EIN<br>(if any)                            |  | al ordinary<br>me or loss   | Check if foreign partnership  |
| (SEE S  | TATEME   | INT)   |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
| Sch   | edule    | B Income Statement—Trade   | or Business Income                |          | ı  |  |                             |                               |
| Cauti   | on: Inc  | clude <b>only</b> trade or business income and                                       | expenses on lines 1a through 22   | belov    | v. See the instructions                    | for m  | ore informat                | tion.                         |
|   |          |  |                                   |          |  |  |                             |                               |
|   | 1a<br>b  | Gross receipts or sales Less returns and allowances                                  |                                   | 1a<br>1b |  | 1c   |                             |                               |
|   | 2        | Cost of goods sold   |                                   | ID       |  | 2  |                             |                               |
| e   | 3        | Gross profit. Subtract line 2 from line  |                                   |          |  | 3  |                             |                               |
| соте  | 4        | Ordinary income (loss) from other part   |                                   |          |  | 4  |                             |                               |
| <u>n</u> c                                    | 5        | Net farm profit (loss) (attach Schedule  |                                   |          |  | 5  |                             |                               |
| _   | 6        | Net gain (loss) from Form 4797, Part I   |                                   |          |  | 6  |                             |                               |
|   | 7        | Other income (loss) (attach statement  |                                   |          |  | 7  |                             |                               |
|   | 8        | Total income (loss). Combine lines 3   | through 7                         |          |  | 8  |                             |                               |
|   | 9        | Salaries and wages (other than to part   |                                   |          |  | 9  |                             |                               |
| <u> </u>                                      | 10       | Guaranteed payments to partners .  |                                   |          |  | 10   |                             |                               |
| tions   | 11       | Repairs and maintenance  |                                   |          |  | 11   |                             |                               |
| nita  | 12       | Bad debts  |                                   |          |  | 12   |                             |                               |
| or<br>E                                       | 13       | Rent   |                                   |          |  | 13   |                             |                               |
| ns f  | 14       | Taxes and licenses   |                                   |          |  | 14   |                             |                               |
| rctic   | 15       | Interest   |                                   |          |  | 15   |                             |                               |
| nstru   | 16a      | Depreciation (if required, attach Form   |                                   |          |  |  |                             |                               |
| .=<br>8                                       | b        | Less depreciation reported elsewhere   |                                   |          |  | 16c  |                             |                               |
| S)  | 17       | Depletion ( <b>Do not</b> deduct oil and gas   |                                   |          |  | 17   |                             |                               |
| on  | 18       | Retirement plans, etc  |                                   |          |  | 18   |                             |                               |
| <u>ic</u> ti                                  | 19<br>20 | Employee benefit programs Other deductions (attach statement)                        |                                   |          |  | 19   |                             |                               |
| Deductions (see instructions for limitations) | 20       | Other deductions (attach statement)  |                                   |          |  | 20   |                             |                               |
| ے<br>—  | 21       | Total deductions. Add the amounts s  | shown in the far right column fo  | or line  | s 9 through 20                             | 21   |                             |                               |
|   | 22       | Ordinary husiness income (loss) from   | n trade or husiness activities. S | uhtra    | ct line 21 from line 8                     | 22   |                             |                               |

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| Schedu                                    | ile K | Partners' Distributive Share Items  |        | Total amount |   |
|---|-------|---|--------|--------------|---|
|   | 1     | Ordinary business income (loss) (page 2, line 22)   | 1      |              |   |
|   | 2     | Net rental real estate income (loss) (attach Form 8825)   | 2      |              |   |
|   | 3a    | Other gross rental income (loss)  |        |              |   |
|   | b     | Expenses from other rental activities (attach statement) 3b   |        |              |   |
|   | С     | Other net rental income (loss). Subtract line 3b from line 3a   | 3с     |              | • |
| (S  | 4     | Guaranteed payments   | 4      |              |   |
| Income (Loss)                             | 5     | Interest income   | 5      |              |   |
| 7   | 6     | Dividends: a Ordinary dividends   | 6a     |              |   |
| πe  |       | <b>b</b> Qualified dividends 6b   |        |              |   |
| 0   | 7     | Royalties   | 7      |              |   |
| <u>ŭ</u>                                  | 8     | Net short-term capital gain (loss) (attach Schedule D (Form 1065))  | 8      |              |   |
|   | 9a    | Net long-term capital gain (loss) (attach Schedule D (Form 1065))   | 9a     |              |   |
|   | b     | Collectibles (28%) gain (loss)  |        |              |   |
|   | С     | Unrecaptured section 1250 gain (attach statement) 9c  |        |              |   |
|   | 10    | Net section 1231 gain (loss) (attach Form 4797)   | 10     |              |   |
|   | 11    | Other income (loss) (see instructions) Type ▶   | 11     |              |   |
| SI  | 12    | Section 179 deduction (attach Form 4562)  | 12     |              |   |
| jo  | 13a   | Contributions   | 13a    |              |   |
| Deductions                                | b     | Investment interest expense   | 13b    |              |   |
| βgr                                       | С     | Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶  | 13c(2) |              |   |
|   | d     | Other deductions (see instructions)  Type ▶   | 13d    |              |   |
| Self-<br>Employ-<br>ment                  | 14a   | Net earnings (loss) from self-employment  | 14a    |              |   |
| Self-<br>mploy<br>ment                    | b     | Gross farming or fishing income   | 14b    |              |   |
| n E                                       | С     | Gross nonfarm income  | 14c    |              |   |
|   | 15a   | Low-income housing credit (section 42(j)(5))  | 15a    |              |   |
| S   | b     | Low-income housing credit (other)   | 15b    |              |   |
| dit                                       | С     | Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)   | 15c    |              |   |
| Credits                                   | d     | Other rental real estate credits (see instructions) Type ▶  | 15d    |              |   |
| 0   | е     | Other rental credits (see instructions)  Type ▶   | 15e    |              |   |
|   | f     | Other credits (see instructions) Type ▶   | 15f    |              |   |
|   | 16a   | Name of country or U.S. possession ▶  |        |              |   |
| တ္  | b     | Gross income from all sources   | 16b    |              | - |
| ion                                       | С     | Gross income sourced at partner level   | 16c    |              | - |
| ansactions                                |       | Foreign gross income sourced at partnership level   | 100    |              |   |
| ısa                                       | d     | Passive category ► e General category ► f Other (attach statement) ►  | 16f    |              | - |
| rar                                       |       | Deductions allocated and apportioned at partner level   | 401    |              |   |
| Ē   | g     | Interest expense h Other  | 16h    |              |   |
| Foreign                                   |       | Deductions allocated and apportioned at partnership level to foreign source income  Passive category   j General category   k Other (attach statement)   k Other (attach statement) | 16k    |              |   |
| ore                                       | ;     | Passive category ▶ j General category ▶ k Other (attach statement) ▶  Total foreign taxes (check one): ▶ □ Paid □ Accrued   | 161    |              |   |
| Ľ   | m     | Reduction in taxes available for credit (attach statement)  | 16m    |              | + |
|   | n     | Other foreign tax information (attach statement)  | 10111  |              |   |
|   | 17a   | Post-1986 depreciation adjustment   | 17a    |              |   |
| Alternative<br>Minimum Tax<br>(AMT) Items | b     | Adjusted gain or loss   | 17b    |              |   |
| ati<br>m ·<br>Iteı                        | C     | Depletion (other than oil and gas)  | 17c    |              |   |
| ern<br>E                                  | d     | Oil, gas, and geothermal properties—gross income  | 17d    |              |   |
| Alternative<br>Iinimum Ta<br>AMT) Items   | е     | Oil, gas, and geothermal properties—deductions  | 17e    |              |   |
| 2   | f     | Other AMT items (attach statement)  | 17f    |              |   |
|   | 18a   | Tax-exempt interest income  | 18a    |              |   |
| tio                                       | b     | Other tax-exempt income   | 18b    |              |   |
| na  | С     | Nondeductible expenses  | 18c    |              |   |
| orr                                       | 19a   | Distributions of cash and marketable securities   | 19a    |              |   |
| <u>l</u> u                                | b     | Distributions of other property   | 19b    |              |   |
| Other Information                         | 20 a  | Investment income   | 20a    |              |   |
|   | b     | Investment expenses   | 20b    |              |   |
| 0   | С     | Other items and amounts (attach statement)  |        |              |   |

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| Sche       | dule L Balance Sheets per Books. (No                 | t required if Item I | 19, page 1, is ansv | vered "Yes.") | · · · · · · · · · · · · · · · · · · · |
|------------|--|----------------------|---------------------|---------------|---------------------------------------|
|            |  | Beginning            | of tax year         | End of t      | ax year                               |
|            | Assets   | (a)                  | (b)                 | (c)           | (d)                                   |
| 1          | Cash   |                      |                     |               |                                       |
| <b>2</b> a | Trade notes and accounts receivable                  |                      |                     |               |                                       |
| b          | Less allowance for bad debts                         |                      |                     |               |                                       |
| 3          | Inventories  |                      |                     |               |                                       |
| 4          | U.S. government obligations                          |                      |                     |               |                                       |
| 5          | Tax-exempt securities                                |                      |                     |               |                                       |
| 6          | Other current assets (attach statement)              |                      |                     |               |                                       |
| 7a         | Loans to partners (or persons related to             |                      |                     |               |                                       |
|            | partners)  |                      |                     |               |                                       |
| b          | Mortgage and real estate loans                       |                      |                     |               |                                       |
| 8          | Other investments (attach statement)                 |                      |                     |               |                                       |
| 9a         | Buildings and other depreciable assets               |                      |                     |               |                                       |
| b          | Less accumulated depreciation                        |                      |                     |               |                                       |
| 10a        | Depletable assets                                    |                      |                     |               |                                       |
|            | Less accumulated depletion                           |                      |                     |               |                                       |
| 11         | Land (net of any amortization)                       |                      |                     |               |                                       |
| 12a        | Intangible assets (amortizable only)                 |                      |                     |               |                                       |
| b          | Less accumulated amortization                        |                      |                     |               |                                       |
| 13         | Other assets (attach statement)                      |                      |                     |               |                                       |
| 14         | Total assets   |                      |                     |               |                                       |
|            | Liabilities and Capital                              |                      |                     |               |                                       |
| 15         | Accounts payable                                     |                      |                     |               |                                       |
| 16         | Mortgages, notes, bonds payable in less than 1 year  |                      |                     |               |                                       |
| 17         | Other current liabilities (attach statement) .       |                      |                     |               |                                       |
| 18         | All nonrecourse loans                                |                      |                     |               |                                       |
| 19a        | Loans from partners (or persons related to partners) |                      |                     |               |                                       |
| b          | Mortgages, notes, bonds payable in 1 year or more    |                      |                     |               |                                       |
| 20         | Other liabilities (attach statement)                 |                      |                     |               |                                       |
| 21         | Partners' capital accounts                           |                      |                     |               |                                       |
| 22         | Total liabilities and capital                        |                      |                     |               | - 0005                                |

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|      | ( /  |                       |            |  | . age <b>-</b>                   |
|------|--|-----------------------|------------|--|----------------------------------|
| Sche | dule M Balance Sheets fo   | r Interest Allocation |            |  |                                  |
|      |  |                       |            | (a) Beginning of tax year  | <b>(b)</b><br>End of<br>tax year |
| 1    | Total U.S. assets  |                       |            |  |                                  |
| 2    | Total foreign assets:  |                       |            |  |                                  |
| а    | Passive category   |                       |            |  |                                  |
| b    | General category   |                       |            |  |                                  |
| С    | Other (attach statement)   |                       |            |  |                                  |
| Sch  | Reconciliation of Incanswered "Yes.")  | come (Loss) per Books | With Inc   | ome (Loss) per Return. (Not req                                      | uired if Item H9, page 1, is     |
|      | ,  |                       | 6 Ir       | ncome recorded on books this   |                                  |
| 1    | Net income (loss) per books .  |                       | 1          | ear not included on Schedule K,                                      |                                  |
| 2    | Income included on Schedule K,   |                       |            | nes 1 through 11 (itemize):  |                                  |
| -    | lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11 not recorded on books this year (itemize):                   |                       | a T        | ax-exempt interest \$  |                                  |
| 3    | Guaranteed payments (other   |                       | 1          | eductions included on Schedule<br>, lines 1 through 13d, and 16l not |                                  |
| Ü    | than health insurance)   |                       |            | harged against book income this                                      |                                  |
| 4    | Expenses recorded on books this year not included on Schedule K, lines 1 through 13d, and 16l (itemize): |                       | <b>a</b> D | ear (itemize):   |                                  |
| a    | Depreciation \$  |                       |            |  |                                  |
| b    | Travel and entertainment \$  |                       | -          | dd lines 6 and 7   |                                  |
| _    |  |                       |            | ncome (loss). Subtract line 8  |                                  |
|      | Add lines 1 through 4  | -10-11-14             | /NI - I    | om line 5  | 1 (() ( ) 11)                    |
|      | edule M-2 Analysis of Partne   | rs' Capital Accounts. |            |  | nswered "Yes.")                  |
| 1    | Balance at beginning of year   |                       | <b>6</b> D | istributions: <b>a</b> Cash  |                                  |
| 2    | Capital contributed:   |                       |            | <b>b</b> Property  |                                  |
|      | <b>a</b> Cash  |                       | <b>7</b> C | other decreases (itemize):   |                                  |
|      | <b>b</b> Property  |                       |            |  |                                  |
| 3    | Net income (loss) per books .  |                       |            |  |                                  |
| 4    | Other increases (itemize):   |                       |            |  |                                  |
|      |  |                       | -          | dd lines 6 and 7   |                                  |
| 5    | Add lines 1 through 4  |                       | 1          | alance at end of year. Subtract                                      |                                  |

Form 8865 (2017)

### Schedule N Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities

**Important:** Complete a separate Form 8865 and Schedule N for each controlled foreign partnership. Enter the totals for each type of transaction that occurred between the foreign partnership and the persons listed in columns (a) through (d).

|    | Transactions<br>of<br>foreign partnership  | (a) U.S. person filing this return | (b) Any domestic<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (c) Any other foreign<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (d) Any U.S. person with a<br>10% or more direct interest<br>in the controlled foreign<br>partnership (other than the<br>U.S. person filing this return) |
|----|--|------------------------------------|---|--|--|
| 1  | Sales of inventory   |                                    |   |  |  |
| 2  | Sales of property rights (patents, trademarks, etc.)   |                                    |   |  |  |
| 3  | Compensation received for technical, managerial, engineering, construction, or like services |                                    |   |  |  |
| 4  | Commissions received .   |                                    |   |  |  |
| 5  | Rents, royalties, and license fees received  |                                    |   |  |  |
| 6  | Distributions received   |                                    |   |  |  |
| 7  | Interest received  |                                    |   |  |  |
| 8  | Other  |                                    |   |  |  |
| 9  | Add lines 1 through 8  |                                    |   |  |  |
| 10 | Purchases of inventory .   |                                    |   |  |  |
| 11 | Purchases of tangible property other than inventory  |                                    |   |  |  |
| 12 | Purchases of property rights (patents, trademarks, etc.)                                     |                                    |   |  |  |
| 13 | Compensation paid for technical, managerial, engineering, construction, or like services     |                                    |   |  |  |
| 14 | Commissions paid   |                                    |   |  |  |
| 15 | Rents, royalties, and license fees paid  |                                    |   |  |  |
| 16 | Distributions paid   |                                    |   |  |  |
| 17 | Interest paid  |                                    |   |  |  |
| 18 | Other  |                                    |   |  |  |
| 19 | Add lines 10 through 18 .  |                                    |   |  |  |
| 20 | Amounts borrowed (enter the maximum loan balance during the year). See instructions          |                                    |   |  |  |
| 21 | Amounts loaned (enter the maximum loan balance during the year). See instructions            |                                    |   |  | 0005   |

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#### SCHEDULE O (Form 8865)

Transfer of Property to a Foreign Partnership (under section 6038B)

Department of the Treasury

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

OMB No. 1545-1668

20**17** Internal Revenue Service ▶ Go to www.irs.gov/Form8865 for instructions and the latest information. Name of transferor Filer's identifying number THE MCKNIGHT FOUNDATION 41-0754835 Name of foreign partnership EIN (if any) Reference ID number (see instructions) PANTHEON EUROPE FUND VI, LP 1a Is the partnership a section 721(c) partnership (as defined in Temporary Regulations section If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property? 

Yes 
No 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 Transfers Reportable Under Section 6038B (b) (c) (d) (f) Type of property Date of Number of items Fair market value Cost or other Section 704(c) Gain recognized transferred on date of transfer allocation method transfer basis on transfer **VARIOUS** 409,456 Cash Stock, notes receivable and payable, and other securities Inventory **Tangible** property used in trade or business Intangible property described in section 197(f)(9) Intangible property, other than intangible property described in section 197(f)(9) Other property Totals 0 409.456 0 Enter the transferor's percentage interest in the partnership: (a) Before the transfer 1.2687 % (b) After the transfer 1.2557 % Supplemental Information Required To Be Reported (see instructions): Part II **Dispositions Reportable Under Section 6038B** (h) (a) Depreciation Depreciation Type of Date of Date of Manner of Gain recognized recapture Gain allocated recapture allocated recognized property original transfer disposition disposition by partnership to partner to partner by partnership Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or Part III

section 904(f)(5)(F)? . . . . .

2017 Report

☐ Yes ☐ No

#### Affiliation Schedule (continued)

| Name   | Address  | EIN (if any) | Total ordinary income or loss | Check if foreign partnership |
|--|--|--------------|-------------------------------|------------------------------|
| ALCHEMY PLAN (GOLD I), LP                            | TRAFALGAR COURT, LES BANQUES, ST. PETER PORT, GY1 3QL, GUERNSEY    |              |                               | ✓                            |
| HGCAPITAL MERCURY A, LP                              | 1 ROYAL PLAZA ROYAL AVENUE, ST PETER PORT, GK GY1 2HL, GUERNSEY    | 98-0697426   |                               | ✓                            |
| PANTHEON GLOBAL CO-INVESTMENT OPPORTUNITIES FUND, LP | 600 MONTGOMERY STREET, 23RD FLOOR, SAN FRANCISCO, CALIFORNIA 94111 | 98-0567148   |                               | ✓                            |
| PRESTON LIMITED PARTNERSHIP                          | TRAFALGAR COURT, LES BANQUES, ST PETER PORT, GY1 3QL, GUERNSEY     |              |                               | ✓                            |

## Form **8865**

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

► Go to www.irs.gov/Form8865 for instructions and the latest information. Information furnished for the foreign partnership's tax year

Information furnished for the foreign partnership's tax year beginning  $\,$  JAN 01  $\,$  , 2017, and ending  $\,$  DEC 31  $\,$  , 20  $\,$  17

OMB No. 1545-1668

Attachment Sequence No. 118

Filer's identifying number Name of person filing this return THE MCKNIGHT FOUNDATION 41-0754835 A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): Filer's address (if you are not filing this form with your tax return) 3 🗸 4 **JAN 01 DEC 31** 17 B Filer's tax year beginning 20 20 and ending С Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name FIN Address Ε Check if any excepted specified foreign financial assets are reported on this form (see instructions) F Information about certain other partners (see instructions) (4) Check applicable box(es) (2) Address (1) Name (3) Identifying number Category 2 Constructive owner Category 1 Name and address of foreign partnership 2(a) EIN (if any) TPG ART FIP AIV III, L.P. 98-1188765 301 COMMERCE STREET, SUITE 3300 2(b) Reference ID number (see instr.) **FORTH WORTH TEXAS** 3 Country under whose laws organized **CANADA** Date of 5 Principal place of 6 Principal business 7 Principal business 8a Functional currency 8b Exchange rate activity code number activity organization business (see instr.) 7/11/2014 **VARIOUS USD** н Provide the following information for the foreign partnership's tax year: Name, address, and identifying number of agent (if any) in the 2 Check if the foreign partnership must file: United States Form 1042 Form 8804 ✓ Form 1065 or 1065-B Service Center where Form 1065 or 1065-B is filed: N/A - FILED ELECTRONICALLY 4 Name and address of person(s) with custody of the books and Name and address of foreign partnership's agent in country of organization, if any records of the foreign partnership, and the location of such books and records, if different MAPLES AND CALDER, UGLAND HOUSE, P.O. BOX 309, GRAND CAYMAN, GEORGETOWN, KY1-1104, CAYMAN ISLANDS TPG ACCOUNTING, 301 COMMERCE STREET, SUITE 3300, FORT WORTH, TX 76102 5 Were any special allocations made by the foreign partnership? 6 Enter the number of Forms 8858, Information Return of U.S. Persons With Respect To Foreign Disregarded Entities 7 How is this partnership classified under the law of the country in which it is organized? PARTNERSHIP Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that is a separate unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 8b. ▶ \_\_ Yes If "Yes," does the separate unit or combined separate unit have a dual consolidated loss as defined in Reg. 1.1503(d)-1(b)(5)(ii)? ▶ Yes h 9 Does this partnership meet both of the following requirements? • The partnership's total receipts for the tax year were less than \$250,000 and Yes • The value of the partnership's total assets at the end of the tax year was less than \$1 million. If "Yes," do not complete Schedules L, M-1, and M-2. Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge Sign Here Only If You and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on al Are Filing information of which preparer has any knowledge. This Form Separately and Not With Your Tax Signature of general partner or limited liability company member Date Return. Print/Type preparer's name Preparer's signature Date PTIN Check | if Paid self-employed Preparer Firm's name Firm's EIN ▶ Use Only Firm's address ▶ Phone no.

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| Sch   | edule    | A Constructive Ownership or box b, enter the name, add interest you constructively o | lress, and U.S. taxpayer ide      | eck the  | ne boxes that apply<br>ring number (if any | to the the of th | ne filer. If y<br>ne person | ou check<br>(s) whose         |
|---|----------|--|-----------------------------------|----------|--|--|-----------------------------|-------------------------------|
|   |          | a Owns a direct interest   |                                   | b        | Owns a constructive                        | intere   | st                          |                               |
|   |          | Name   | Address                           |          | Identifying number (if                     | any)   | Check if foreign person     | Check if<br>direct<br>partner |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
| Sch   | edule    | A-1 Certain Partners of Foreign  | n Partnership (see instructi      | ons)     |  |  |                             |                               |
|   |          | Name   | Address                           |          | Identifying num                            | ber (if  | any)                        | Check if<br>foreign<br>person |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          | artnership have any other foreign perso  |                                   |          |  |  | Yes                         | ☐ No                          |
| Sch   | edule    | A-2 Affiliation Schedule. List a direct interest or indirectly or                    |                                   | omes     | stic) in which the fo                      | reign  | partnersh                   |                               |
|   |          | Name   | Address                           |          | EIN<br>(if any)                            |  | al ordinary<br>me or loss   | Check if foreign partnership  |
| (SEE S  | TATEME   | INT)   |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
|   |          |  |                                   |          |  |  |                             |                               |
| Sch   | edule    | B Income Statement—Trade   | or Business Income                |          | ı  |  |                             |                               |
| Cauti   | on: Inc  | clude <b>only</b> trade or business income and                                       | expenses on lines 1a through 22   | belov    | v. See the instructions                    | for m  | ore informat                | tion.                         |
|   |          |  |                                   |          |  |  |                             |                               |
|   | 1a<br>b  | Gross receipts or sales Less returns and allowances                                  |                                   | 1a<br>1b |  | 1c   |                             |                               |
|   | 2        | Cost of goods sold   |                                   | ID       |  | 2  |                             |                               |
| e   | 3        | Gross profit. Subtract line 2 from line  |                                   |          |  | 3  |                             |                               |
| соте  | 4        | Ordinary income (loss) from other part   |                                   |          |  | 4  |                             |                               |
| <u>n</u> c                                    | 5        | Net farm profit (loss) (attach Schedule  |                                   |          |  | 5  |                             |                               |
| _   | 6        | Net gain (loss) from Form 4797, Part I   |                                   |          |  | 6  |                             |                               |
|   | 7        | Other income (loss) (attach statement  |                                   |          |  | 7  |                             |                               |
|   | 8        | Total income (loss). Combine lines 3   | through 7                         |          |  | 8  |                             |                               |
|   | 9        | Salaries and wages (other than to part   |                                   |          |  | 9  |                             |                               |
| <u> </u>                                      | 10       | Guaranteed payments to partners .  |                                   |          |  | 10   |                             |                               |
| tions   | 11       | Repairs and maintenance  |                                   |          |  | 11   |                             |                               |
| nita  | 12       | Bad debts  |                                   |          |  | 12   |                             |                               |
| or<br>E                                       | 13       | Rent   |                                   |          |  | 13   |                             |                               |
| ns f  | 14       | Taxes and licenses   |                                   |          |  | 14   |                             |                               |
| rctic   | 15       | Interest   |                                   |          |  | 15   |                             |                               |
| nstru   | 16a      | Depreciation (if required, attach Form   |                                   |          |  |  |                             |                               |
| .=<br>9                                       | b        | Less depreciation reported elsewhere   |                                   |          |  | 16c  |                             |                               |
| S)  | 17       | Depletion ( <b>Do not</b> deduct oil and gas   |                                   |          |  | 17   |                             |                               |
| on  | 18       | Retirement plans, etc  |                                   |          |  | 18   |                             |                               |
| <u>ic</u> ti                                  | 19<br>20 | Employee benefit programs Other deductions (attach statement)                        |                                   |          |  | 19   |                             |                               |
| Deductions (see instructions for limitations) | 20       | Other deductions (attach statement)  |                                   |          |  | 20   |                             |                               |
| ے<br>—  | 21       | Total deductions. Add the amounts s  | shown in the far right column fo  | or line  | s 9 through 20                             | 21   |                             |                               |
|   | 22       | Ordinary husiness income (loss) from   | n trade or husiness activities. S | uhtra    | ct line 21 from line 8                     | 22   |                             |                               |

Page 3

| Schedu                                    | ıle K    | Partners' Distributive Share Items  |            | Total amount |
|---|----------|---|------------|--------------|
|   | 1        | Ordinary business income (loss) (page 2, line 22)   | 1          |              |
|   | 2        | Net rental real estate income (loss) (attach Form 8825)                                   | 2          |              |
|   | 3a       | Other gross rental income (loss)  |            |              |
|   | b        | Expenses from other rental activities (attach statement) 3b                               |            |              |
|   | С        | Other net rental income (loss). Subtract line 3b from line 3a                             | 3с         |              |
| (S  | 4        | Guaranteed payments   | 4          |              |
| Income (Loss)                             | 5        | Interest income   | 5          |              |
| 7   | 6        | Dividends: a Ordinary dividends   | 6a         |              |
| me  |          | <b>b</b> Qualified dividends 6b   |            |              |
| OS  | 7        | Royalties   | 7          |              |
| <u>=</u>                                  | 8        | Net short-term capital gain (loss) (attach Schedule D (Form 1065))                        | 8          |              |
|   | 9a       | Net long-term capital gain (loss) (attach Schedule D (Form 1065))                         | 9a         |              |
|   | b        | Collectibles (28%) gain (loss)  |            |              |
|   | С        | Unrecaptured section 1250 gain (attach statement) 9c                                      |            |              |
|   | 10       | Net section 1231 gain (loss) (attach Form 4797)   | 10         |              |
|   | 11       | Other income (loss) (see instructions) Type ▶   | 11         |              |
| ns  | 12       | Section 179 deduction (attach Form 4562)  | 12         |              |
| Deductions                                | 13a      | Contributions   | 13a        |              |
| nc  | b        | Investment interest expense   | 13b        |              |
| eq  | С        | Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶                                    | 13c(2)     |              |
|   | d        | Other deductions (see instructions) Type ▶  | 13d        |              |
| Self-<br>Employ-<br>ment                  | 14a      |   | 14a        |              |
| Self-<br>mploy<br>ment                    | b        | Gross farming or fishing income   | 14b        |              |
|   | С        | Gross nonfarm income  | 14c        |              |
|   | 15a      | Low-income housing credit (section 42(j)(5))  | 15a        |              |
| ts  | b        | Low-income housing credit (other)   | 15b        |              |
| Credits                                   | С        | Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)             | 15c        |              |
| Ö   | d        | Other rental real estate credits (see instructions)                                       | 15d        |              |
| _   | e        | Other rental credits (see instructions)  Type ►  Other credits (see instructions)  Type ► | 15e<br>15f |              |
|   |          |   | 101        |              |
|   | 16a<br>b | Name of country or U.S. possession ►  Gross income from all sources                       | 16b        |              |
| ns  | C        | Gross income sourced at partner level   | 16c        |              |
| tio                                       |          | Foreign gross income sourced at partnership level   | 100        |              |
| ansactions                                | d        | Passive category ► e General category ► f Other (attach statement) ►                      | 16f        |              |
| ıns                                       |          | Deductions allocated and apportioned at partner level                                     |            |              |
| Tra                                       | g        | Interest expense ► h Other  | 16h        |              |
|   |          | Deductions allocated and apportioned at partnership level to foreign source income        |            |              |
| Foreign                                   | i        | Passive category ▶ j General category ▶ k Other (attach statement) ▶                      | 16k        |              |
| ō   | 1        | Total foreign taxes (check one): ▶ ☐ Paid ☐ Accrued                                       | 16I        |              |
|   | m        | Reduction in taxes available for credit (attach statement)                                | 16m        |              |
|   | n        | Other foreign tax information (attach statement)  |            |              |
| ××  | 17a      | Post-1986 depreciation adjustment   | 17a        |              |
| Alternative<br>Minimum Tax<br>(AMT) Items | b        | Adjusted gain or loss   | 17b        |              |
| nat<br>um<br>) Ite                        | С        | Depletion (other than oil and gas)  | 17c        |              |
| ter<br>im<br>MT)                          | d        | Oil, gas, and geothermal properties—gross income  | 17d        |              |
| Ą Ä Ą                                     | е        | Oil, gas, and geothermal properties—deductions  | 17e        |              |
|   | f        | Other AMT items (attach statement)  | 17f        |              |
| uc  | 18a      | Tax-exempt interest income  | 18a        |              |
| Other Information                         | b        | Other tax-exempt income   | 18b        |              |
| Ĕ   | С        | Nondeductible expenses  | 18c        |              |
| for                                       | 19a      | Distributions of cash and marketable securities   | 19a        |              |
| <u>-</u>                                  | b        | Distributions of other property   | 19b        |              |
| Jer                                       | 20 a     | Investment income   | 20a        |              |
| <del>=</del>                              | b        | Investment expenses   | 20b        |              |
| -   | С        | Other items and amounts (attach statement)  |            |              |

Page **4** 

| Sche | Schedule L Balance Sheets per Books. (Not required if Item H9, page 1, is answered "Yes.") |           |             |          |          |  |  |
|------|--|-----------|-------------|----------|----------|--|--|
|      |  | Beginning | of tax year | End of t | tax year |  |  |
|      | Assets   | (a)       | (b)         | (c)      | (d)      |  |  |
| 1    | Cash   |           |             |          |          |  |  |
| 2a   | Trade notes and accounts receivable  |           |             |          |          |  |  |
| b    | Less allowance for bad debts   |           |             |          |          |  |  |
| 3    | Inventories  |           |             |          |          |  |  |
| 4    | U.S. government obligations  |           |             |          |          |  |  |
| 5    | Tax-exempt securities  |           |             |          |          |  |  |
| 6    | Other current assets (attach statement)  |           |             |          |          |  |  |
| 7a   | Loans to partners (or persons related to   |           |             |          |          |  |  |
|      | partners)  |           |             |          |          |  |  |
| b    | Mortgage and real estate loans   |           |             |          |          |  |  |
| 8    | Other investments (attach statement)   |           |             |          |          |  |  |
| 9a   | Buildings and other depreciable assets   |           |             |          |          |  |  |
| b    | Less accumulated depreciation  |           |             |          |          |  |  |
| 10a  | Depletable assets  |           |             |          |          |  |  |
| b    | Less accumulated depletion   |           |             |          |          |  |  |
| 11   | Land (net of any amortization)   |           |             |          |          |  |  |
| 12a  | Intangible assets (amortizable only)   |           |             |          |          |  |  |
| b    | Less accumulated amortization  |           |             |          |          |  |  |
| 13   | Other assets (attach statement)  |           |             |          |          |  |  |
| 14   | Total assets   |           |             |          |          |  |  |
|      | Liabilities and Capital  |           |             |          |          |  |  |
| 15   | Accounts payable   |           |             |          |          |  |  |
| 16   | Mortgages, notes, bonds payable in less than 1 year  |           |             |          |          |  |  |
| 17   | Other current liabilities (attach statement) .   |           |             |          |          |  |  |
| 18   | All nonrecourse loans  |           |             |          |          |  |  |
| 19a  | Loans from partners (or persons related to partners)                                       |           |             |          |          |  |  |
| b    | Mortgages, notes, bonds payable in 1 year or more  |           |             |          |          |  |  |
| 20   | Other liabilities (attach statement)   |           |             |          |          |  |  |
| 21   | Partners' capital accounts   |           |             |          |          |  |  |
| 22   | Total liabilities and capital  |           |             |          |          |  |  |

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|      | ( /  |                       |            |  | . age <b>-</b>                   |
|------|--|-----------------------|------------|--|----------------------------------|
| Sche | dule M Balance Sheets fo   | r Interest Allocation |            |  |                                  |
|      |  |                       |            | (a) Beginning of tax year  | <b>(b)</b><br>End of<br>tax year |
| 1    | Total U.S. assets  |                       |            |  |                                  |
| 2    | Total foreign assets:  |                       |            |  |                                  |
| а    | Passive category   |                       |            |  |                                  |
| b    | General category   |                       |            |  |                                  |
| С    | Other (attach statement)   |                       |            |  |                                  |
| Sch  | Reconciliation of Incanswered "Yes.")  | come (Loss) per Books | With Inc   | ome (Loss) per Return. (Not req                                      | uired if Item H9, page 1, is     |
|      | ,  |                       | 6 Ir       | ncome recorded on books this   |                                  |
| 1    | Net income (loss) per books .  |                       | 1          | ear not included on Schedule K,                                      |                                  |
| 2    | Income included on Schedule K,   |                       |            | nes 1 through 11 (itemize):  |                                  |
| -    | lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11 not recorded on books this year (itemize):                   |                       | a T        | ax-exempt interest \$  |                                  |
| 3    | Guaranteed payments (other   |                       | 1          | eductions included on Schedule<br>, lines 1 through 13d, and 16l not |                                  |
| Ü    | than health insurance)   |                       |            | harged against book income this                                      |                                  |
| 4    | Expenses recorded on books this year not included on Schedule K, lines 1 through 13d, and 16l (itemize): |                       | <b>a</b> D | ear (itemize):   |                                  |
| a    | Depreciation \$  |                       |            |  |                                  |
| b    | Travel and entertainment \$  |                       | -          | dd lines 6 and 7   |                                  |
| _    |  |                       |            | ncome (loss). Subtract line 8  |                                  |
|      | Add lines 1 through 4  | -10-11-14             | /NI - I    | om line 5  | 1 (() ( ) 11)                    |
|      | edule M-2 Analysis of Partne   | rs' Capital Accounts. |            |  | nswered "Yes.")                  |
| 1    | Balance at beginning of year   |                       | <b>6</b> D | istributions: <b>a</b> Cash  |                                  |
| 2    | Capital contributed:   |                       |            | <b>b</b> Property  |                                  |
|      | <b>a</b> Cash  |                       | <b>7</b> C | other decreases (itemize):   |                                  |
|      | <b>b</b> Property  |                       |            |  |                                  |
| 3    | Net income (loss) per books .  |                       |            |  |                                  |
| 4    | Other increases (itemize):   |                       |            |  |                                  |
|      |  |                       | -          | dd lines 6 and 7   |                                  |
| 5    | Add lines 1 through 4  |                       | 1          | alance at end of year. Subtract                                      |                                  |

Form 8865 (2017)

#### Schedule N Transactions Between Controlled Foreign Partnership and Partners or Other Related Entities

**Important:** Complete a separate Form 8865 and Schedule N for each controlled foreign partnership. Enter the totals for each type of transaction that occurred between the foreign partnership and the persons listed in columns (a) through (d).

|    | Transactions<br>of<br>foreign partnership  | (a) U.S. person filing this return | (b) Any domestic<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (c) Any other foreign<br>corporation or partnership<br>controlling or controlled<br>by the U.S. person filing<br>this return | (d) Any U.S. person with a 10% or more direct interest in the controlled foreign partnership (other than the U.S. person filing this return) |
|----|--|------------------------------------|---|--|--|
| 1  | Sales of inventory   |                                    |   |  |  |
| 2  | Sales of property rights (patents, trademarks, etc.)   |                                    |   |  |  |
| 3  | Compensation received for technical, managerial, engineering, construction, or like services |                                    |   |  |  |
| 4  | Commissions received .   |                                    |   |  |  |
| 5  | Rents, royalties, and license fees received  |                                    |   |  |  |
| 6  | Distributions received   |                                    |   |  |  |
| 7  | Interest received  |                                    |   |  |  |
| 8  | Other  |                                    |   |  |  |
| 9  | Add lines 1 through 8  |                                    |   |  |  |
| 10 | Purchases of inventory .   |                                    |   |  |  |
| 11 | Purchases of tangible property other than inventory  |                                    |   |  |  |
| 12 | Purchases of property rights (patents, trademarks, etc.)                                     |                                    |   |  |  |
| 13 | Compensation paid for technical, managerial, engineering, construction, or like services     |                                    |   |  |  |
| 14 | Commissions paid   |                                    |   |  |  |
| 15 | Rents, royalties, and license fees paid  |                                    |   |  |  |
| 16 | Distributions paid   |                                    |   |  |  |
| 17 | Interest paid  |                                    |   |  |  |
| 18 | Other  |                                    |   |  |  |
| 19 | Add lines 10 through 18 .  |                                    |   |  |  |
| 20 | Amounts borrowed (enter the maximum loan balance during the year). See instructions          |                                    |   |  |  |
| 21 | Amounts loaned (enter the maximum loan balance during the year). See instructions            |                                    |   |  |  |

#### SCHEDULE O (Form 8865)

## Transfer of Property to a Foreign Partnership (under section 6038B)

Department of the Treasury Internal Revenue Service ► Attach to Form 8865. See Instructions for Form 8865.

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

OMB No. 1545-1668

Name of transferor Filer's identifying number THE MCKNIGHT FOUNDATION 41-0754835 Name of foreign partnership EIN (if any) Reference ID number (see instructions) TPG ART FIP AIV III, L.P. 98-1188765 1a Is the partnership a section 721(c) partnership (as defined in Temporary Regulations section If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property? 

Yes 
No 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 Transfers Reportable Under Section 6038B (b) (c) (d) (f) Type of property Date of Number of items Fair market value Cost or other Section 704(c) Gain recognized transferred on date of transfer allocation method transfer basis on transfer **VARIOUS** 809,861 Cash Stock, notes receivable and payable, and other securities Inventory **Tangible** property used in trade or business Intangible property described in section 197(f)(9) Intangible property, other than intangible property described in section 197(f)(9) Other property Totals 0 809.861 0 Enter the transferor's percentage interest in the partnership: (a) Before the transfer 10.7960 % (b) After the transfer 10.7960 % Supplemental Information Required To Be Reported (see instructions): Part II **Dispositions Reportable Under Section 6038B** (h) (a) Depreciation Depreciation Type of Date of Date of Manner of Gain recognized recapture Gain allocated recapture allocated recognized property original transfer disposition disposition by partnership to partner to partner by partnership Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or Part III ☐ Yes ☑ No section 904(f)(5)(F)? . . . . .



Affiliation Schedule (continued)

| Name   | Address   | EIN (if any) | Total ordinary income or loss | Check if foreign partnership |
|--|---|--------------|-------------------------------|------------------------------|
| TPG ART FUNDO DE INVESTIMENTO EM PARTICIPACOES | AV PRESIDENTE JUSCELINO KUBITSCHEK, 2041 E 2235 - BLOCO A; PARTE VILA<br>NOVA CONCEICAO, SAO PAULO, 04543-011, BRAZIL |              |                               | ✓                            |

## Form **5471**

(Rev. December 2015)

### Information Return of U.S. Persons With Respect **To Certain Foreign Corporations**

► For more information about Form 5471, see www.irs.gov/form5471

Information furnished for the foreign corporation's annual accounting period (tax year required by

OMB No. 1545-0704

Attachment

| Department of the Treasury Internal Revenue Service | Information furnished for the fore section 898) (see instructions) be | IANIO                      |                              | unting period (ta<br><sup>7</sup> , and ending | DEC 31           | ired by<br>, <sub>20</sub> 17 | Attachr<br>Sequer             | nent<br>nce No. <b>"</b> | 121     |
|---|---|----------------------------|------------------------------|--|------------------|-------------------------------|-------------------------------|--------------------------|---------|
| Name of person filing this re                       | eturn   |                            | A Identi                     | fying number                                   |                  |                               |                               |                          |         |
| THE MCKNIGHT FOUN                                   | IDATION   |                            |                              |  | 41-07            | 54835                         |                               |                          |         |
| Number, street, and room or si                      | uite no. (or P.O. box number if mail is not de                        | elivered to street address | s) <b>B</b> Categ            | ory of filer (See in:                          | structions. Ch   | neck applica                  | able box(es)):                |                          |         |
| 710 SECOND STREET                                   | SOUTH, STE 400  |                            |                              | 1 (repealed                                    | ) 2 🗌            | 3 🔽 4                         | □ 5 □                         |                          |         |
| City or town, state, and ZIP                        | code  |                            | C Enter                      | the total percenta                             | ge of the fore   | ign corpora                   | tion's voting                 |                          |         |
| MINNEAPOLIS, MN 554                                 | 401   |                            | stock                        | you owned at the                               | end of its an    | nual accour                   | nting period                  |                          | 0 %     |
| Filer's tax year beginning                          | JAN 01 , 20 1   | , and ending               |                              | DEC 31   | , 20 17          |                               |                               |                          |         |
| D Check if any excepted sp                          | pecified foreign financial assets are rep                             | orted on this form (see    | e instructions)              |  |                  |                               |                               |                          |         |
| E Person(s) on whose beha                           | alf this information return is filed:                                 |                            |                              |  |                  |                               |                               |                          |         |
| (1) Nam   | e   | (2) Address                |                              | (3) Identify                                   | ing number       | (4) CI                        | heck applica                  | .ble box(e               | es)     |
|   |   | (=) / (a a . c c c         |                              | (0) (00)                                       |                  | Shareholde                    | r Officer                     | Dire                     | ctor    |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
| U.S. do   | ll applicable lines and sched<br>llars unless otherwise indica        |                            | ation <b>mu</b>              | <b>st</b> be in Engl                           | ish. All an      | nounts <b>n</b>               | nust be s                     | stated                   | in<br>  |
|   | VENUE NON-TAXABLE OFFSHO  | ORE MASTER FUNI            | D LTD.                       |  | <b>b(1)</b> Empl | oyer identific                | cation numb                   | er, if any               |         |
| 345 PARK AVENUE, 28<br>NEW YORK, NY, 10154          |   |                            |                              |  | b(2) Refer       | ence ID nun                   | nber (see ins                 | tructions                | 3)      |
| NEW TORK, NT, 10134                                 | •   |                            |                              |  | '                | BLAC                          | KSTONE                        |                          | ,       |
|   |   |                            |                              |  | <b>c</b> Coun    | try under wh                  | nose laws inc                 | corporate                | <br>ed  |
|   |   |                            |                              |  | CJ               |                               |                               |                          |         |
| <b>d</b> Date of incorporation                      | e Principal place of business   | f Principal busines        | •                            | <b>g</b> Principal b                           | usiness activ    | rity                          | <b>h</b> Function             | al curren                | icy     |
| 5/5/2006  | CJ  | 523900                     | 1                            | INVESTMENTS                                    | 2                | US                            | SD.                           |                          |         |
|   | nformation for the foreign corporation's                              |                            |                              | INVESTIMENTS                                   | ,                | 00                            |                               |                          |         |
|   | lentifying number of branch office or ac                              |                            |                              | ncome tax return v                             | as filed ente    | ar.                           |                               |                          |         |
| United States                                       | , ,   | · `                        |                              |  |                  |                               | J.S. income t                 | ax paid                  |         |
| BLACKSTONE ALTERN<br>345 PARK AVENUE, 28            | NATIVE ASSET MANAGEMENT L   | P., 13-3702086             | (i) Taxable income or (loss) |  |                  | (after all credits)           |                               |                          |         |
| NEW YORK, NEW YOR                                   |   |                            |                              |  |                  |                               |                               |                          |         |
| ,   | ,   |                            |                              |  |                  |                               |                               |                          |         |
| c Name and address of                               | foreign corporation's statutory or reside                             | ent agent in country       | <b>d</b> Name and            | l address (includin                            | a corporate o    | department.                   | if applicable                 | e) of pers               | on (or  |
| of incorporation                                    | ,   |                            | persons) v                   | with custody of the                            | books and r      | ecords of th                  |                               |                          |         |
|   |   |                            |                              | on of such books a<br>ONE GROUP                | ind records, i   | f different                   |                               |                          |         |
|   |   |                            |                              | AVENUE, 28TH                                   | FLOOR            |                               |                               |                          |         |
|   |   |                            | NEW YORK                     | K, NEW YORK,                                   | 10154            |                               |                               |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
| Schedule A Stoc                                     | k of the Foreign Corporat   | ion                        |                              |  |                  |                               |                               |                          |         |
|   |   |                            |                              | (b) Number                                     | of shares iss    | ued and out                   | standing                      |                          |         |
| (a)   | Description of each class of stock                                    |                            |                              | Beginning of annu-<br>accounting period        | al               |                               | ii) End of an<br>eccounting p |                          |         |
| COMMON  |   |                            |                              | 473,694  |                  |                               | 363,411                       |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
|   |   |                            |                              |  |                  |                               |                               |                          |         |
| For Paperwork Reduct                                | ion Act Notice, see instructions.                                     |                            | Cat.                         | No. 49958V                                     |                  |                               | Form <b>547</b>               | 1 (Rev. 1                | 2-2015) |

Form 5471 (Rev. 12-2015)

| Schedule B U.S. Shareholders o   | f Foreign Corporation (see instructions)  | )   |   |   |
|--|---|---|---|---|
| (a) Name, address, and identifying number of shareholder                       | (b) Description of each class of stock held by<br>shareholder. Note: This description should<br>match the corresponding description entered in<br>Schedule A, column (a). | (c) Number of<br>shares held at<br>beginning of annual<br>accounting period | (d) Number of<br>shares held at<br>end of annual<br>accounting period | (e) Pro rata share<br>of subpart F<br>income (enter as a<br>percentage) |
| THE MCKNIGHT FOUNDATION 710 SECOND STREET SOUTH, STE 400 MINNEAPOLIS, MN 55401 | COMMON  | 56842   | 0   |   |
|  |   |   |   |   |
|  |   |   |   |   |
|  |   |   |   |   |
|  |   |   |   | -   |
|  |   |   |   | ]   |
|  |   |   |   |   |
|  |   |   |   |   |
|  |   |   |   | -   |
|  |   |   |   | -   |
| Schedule C Income Statement  | <br>(see instructions)  |   |   |   |

**Important:** Report all information in functional currency in accordance with U.S. GAAP. Also, report each amount in U.S. dollars translated from functional currency (using GAAP translation rules). However, if the functional currency is the U.S. dollar, complete only the U.S. Dollars column. See instructions for special rules for DASTM corporations.

|            |     |  |     | Functional Currency | U.S. Dollars |
|------------|-----|--|-----|---------------------|--------------|
|            | 1a  | Gross receipts or sales  | 1a  |                     |              |
|            | b   | Returns and allowances   | 1b  |                     |              |
|            | С   | Subtract line 1b from line 1a  | 1c  | 0                   | 0            |
|            | 2   | Cost of goods sold   | 2   |                     |              |
| Je         | 3   | Gross profit (subtract line 2 from line 1c)  | 3   | 0                   | 0            |
| Income     | 4   | Dividends  | 4   |                     |              |
| <u>=</u>   | 5   | Interest   | 5   |                     | 51,193       |
|            | 6a  | Gross rents  | 6a  |                     |              |
|            | b   | Gross royalties and license fees   | 6b  |                     |              |
|            | 7   | Net gain or (loss) on sale of capital assets                                       | 7   |                     | 75,044,040   |
|            | 8   | Other income (attach statement)  | 8   | 0                   | 0            |
|            | 9   | Total income (add lines 3 through 8)   | 9   | 0                   | 75,095,233   |
|            | 10  | Compensation not deducted elsewhere  | 10  |                     |              |
|            | 11a | Rents  | 11a |                     |              |
|            | b   | Royalties and license fees   | 11b |                     |              |
| Deductions | 12  | Interest   | 12  |                     | 87,555       |
| 뜑          | 13  | Depreciation not deducted elsewhere  | 13  |                     |              |
| ğ          | 14  | Depletion  | 14  |                     |              |
| å          | 15  | Taxes (exclude provision for income, war profits, and excess profits taxes)        | 15  |                     |              |
|            | 16  | Other deductions (attach statement—exclude provision for income, war profits,      |     |                     |              |
|            |     | and excess profits taxes)  | 16  | 0                   | 909,899      |
|            | 17  | Total deductions (add lines 10 through 16)   | 17  | 0                   | 997,454      |
|            | 18  | Net income or (loss) before extraordinary items, prior period adjustments, and the |     |                     |              |
| me         |     | provision for income, war profits, and excess profits taxes (subtract line 17 from |     |                     |              |
| Net Income |     | line 9)  | 18  | 0                   | 74,097,779   |
| <u>+</u>   | 19  | Extraordinary items and prior period adjustments (see instructions)                | 19  |                     |              |
| Se         | 20  | Provision for income, war profits, and excess profits taxes (see instructions)     | 20  |                     |              |
|            | 21  | Current year net income or (loss) per books (combine lines 18 through 20)          | 21  | 0                   | 74,097,779   |

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Form 5471 (Rev. 12-2015) Page **3** 

| Sc | hedule E Income, War Profits, and Excess Profits Ta | exes Paid or Accrued    | (see instructions)     | •                             |  |
|----|---|-------------------------|------------------------|-------------------------------|--|
|    |   |                         | Amount of tax          |                               |  |
|    | (a)  Name of country or U.S. possession             | (b) In foreign currency | (c)<br>Conversion rate | <b>(d)</b><br>In U.S. dollars |  |
| 1  | U.S.  |                         |                        |                               |  |
| 2  | UNITED STATES                                       |                         |                        |                               |  |
| 3  |   |                         |                        |                               |  |
| 4  |   |                         |                        |                               |  |
| 5  |   |                         |                        |                               |  |
| 6  |   |                         |                        |                               |  |
| 7  |   |                         |                        |                               |  |
| 8  | Total   |                         |                        | 0                             |  |

Schedule F Balance Sheet

**Important:** Report all amounts in U.S. dollars prepared and translated in accordance with U.S. GAAP. See instructions for an exception for DASTM corporations.

|    | Assets  | (a) Beginning of annual accounting period | (b) End of annual accounting period   |
|----|---|---|---------------------------------------|
| 1  | Cash  | 326,213                                   | 15,801,174                            |
| 2a | Trade notes and accounts receivable                   |   |                                       |
| b  | Less allowance for bad debts                          | ( )                                       | )                                     |
| 3  | Inventories   |   |                                       |
| 4  | Other current assets (attach statement)               | 78,227,165                                | 40,922,385                            |
| 5  | Loans to shareholders and other related persons       |   |                                       |
| 6  | Investment in subsidiaries (attach statement)         | 0   | 0                                     |
| 7  | Other investments (attach statement)                  | 934,763,221                               | 769,709,902                           |
| 8a | Buildings and other depreciable assets                |   |                                       |
| b  | Less accumulated depreciation                         | ( )                                       | )                                     |
| 9a | Depletable assets                                     |   |                                       |
| b  | Less accumulated depletion                            | ( )                                       | )                                     |
| 10 | Land (net of any amortization)                        |   |                                       |
| 11 | Intangible assets:                                    |   |                                       |
| а  | Goodwill  |   |                                       |
| b  | Organization costs                                    |   |                                       |
| С  | Patents, trademarks, and other intangible assets      |   |                                       |
| d  | Less accumulated amortization for lines 11a, b, and c | ( )                                       | )                                     |
| 12 | Other assets (attach statement)                       | 1,830,000                                 | 12,160,000                            |
|    |   |   |                                       |
| 13 | Total assets  | 1,015,146,599                             | 838,593,461                           |
|    | Liabilities and Shareholders' Equity                  |   |                                       |
| 14 | Accounts payable                                      | 159,312                                   | 152,999                               |
| 15 | Other current liabilities (attach statement)          | 15,987                                    | 13,188                                |
| 16 | Loans from shareholders and other related persons     |   | · · · · · · · · · · · · · · · · · · · |
| 17 | Other liabilities (attach statement)                  | 75,134,850                                | 58,164,099                            |
| 18 | Capital stock:  |   | · · ·                                 |
| а  | Preferred stock                                       |   |                                       |
| b  | Common stock  | 939,836,450                               | 780,263,175                           |
| 19 | Paid-in or capital surplus (attach reconciliation)    |   | · · · · · · · · · · · · · · · · · · · |
| 20 | Retained earnings                                     |   |                                       |
| 21 | Less cost of treasury stock                           | ( )(                                      | )                                     |
|    |   |   |                                       |
| 22 | Total liabilities and shareholders' equity            | 1,015,146,599                             | 838,593,461                           |
|    | . , , , , , , , , , , , , , , , , , , ,               |   | n <b>5471</b> (Rev. 12-2015)          |

Form **5471** (Rev. 12-2015)

Form 5471 (Rev. 12-2015)

| Sch    | edule G Other Information  |                     |                      |                         |          |
|--------|--|---------------------|----------------------|-------------------------|----------|
|        |  |                     |                      | Yes N                   | No       |
| 1      | During the tax year, did the foreign corporation own at least a 10% int partnership?   |                     |                      |                         | V        |
|        | If "Yes," see the instructions for required statement.   |                     |                      |                         | ٢        |
| 2      | During the tax year, did the foreign corporation own an interest in any  | trust?              |                      | 🗆 [                     | V        |
|        | During the tax year, did the foreign corporation own any foreign entities  |                     |                      |                         |          |
|        | from their owners under Regulations sections 301.7701-2 and 301.770  |                     |                      | · ·                     | V        |
|        | If "Yes," you are generally required to attach Form 8858 for each entit  | y (see instructions | s).                  |                         |          |
| 4      | During the tax year, was the foreign corporation a participant in any co   | ost sharing arrang  | gement?              | 🔲 [                     | ~        |
| 5      | During the course of the tax year, did the foreign corporation become  | a participant in a  | ny cost sharing arr  | rangement? [            | ~        |
| 6      | During the tax year, did the foreign corporation participate in any repo   | rtable transaction  | as defined in Reg    | gulations               |          |
|        | section 1.6011-4?  |                     |                      | [                       | •        |
|        | If "Yes," attach Form(s) 8886 if required by Regulations section 1.601   |                     |                      |                         |          |
| 7      | During the tax year, did the foreign corporation pay or accrue any fore  | =                   | disqualified for cre |                         |          |
| _      | section 901(m)?  |                     |                      |                         | <b>v</b> |
| 8      | During the tax year, did the foreign corporation pay or accrue foreign foreign toyee that were previously supported under certific 200 as no |                     |                      |                         |          |
| Sch    | foreign taxes that were previously suspended under section 909 as no edule H Current Earnings and Profits (see instructions)                 | longer suspende     | eu?                  |                         | <b>v</b> |
|        | ortant: Enter the amounts on lines 1 through 5c in functional co   | ırrencv.            |                      |                         |          |
| 1      | Current year net income or (loss) per foreign books of account   |                     |                      | 1                       |          |
|        | у англий у англий и (чесе, регистерия и не и   |                     |                      |                         |          |
| 2      | Net adjustments made to line 1 to determine current earnings and   | Net                 | Net                  |                         |          |
|        | profits according to U.S. financial and tax accounting standards   | Additions           | Subtractions         |                         |          |
|        | (see instructions):  | Additions           | Oubtractions         |                         |          |
| а      | Capital gains or losses  |                     |                      |                         |          |
| b      | •  |                     |                      |                         |          |
| С      | ·  |                     |                      |                         |          |
| d      |  |                     |                      |                         |          |
| e      | 9  |                     |                      | _                       |          |
| f      | Inventory adjustments  |                     |                      | _                       |          |
| g      |  |                     |                      | _                       |          |
| 1<br>3 | Other (attach statement)   |                     |                      |                         |          |
| 4      | Total net subtractions   |                     |                      | _                       |          |
| 5a     |  |                     |                      | 5a                      |          |
| b      |  |                     |                      | 5b                      |          |
| С      | Combine lines 5a and 5b  |                     |                      | 5c                      |          |
| d      | Current earnings and profits in U.S. dollars (line 5c translated at the  | appropriate exch    | ange rate as         |                         |          |
|        | defined in section 989(b) and the related regulations (see instruction   | s))                 |                      | 5d                      |          |
|        | Enter exchange rate used for line 5d ▶   | /                   |                      |                         |          |
|        | edule I Summary of Shareholder's Income From Foreign Co  |                     |                      |                         |          |
|        | m E on page 1 is completed, a separate Schedule I must be filed for ea   | ch Category 4 or    | 5 filer for whom re  | eporting is turnished o | on       |
| tnis i | Form 5471. This schedule I is being completed for:   |                     |                      |                         |          |
| Nam    | e of U.S. shareholder ▶  | Identifying numbe   | ar <b>&gt;</b>       |                         |          |
| 1      | Subpart F income (line 38b, Worksheet A in the instructions)   |                     |                      | 1                       |          |
| 2      | Earnings invested in U.S. property (line 17, Worksheet B in the instru   |                     |                      | 2                       |          |
| 3      | Previously excluded subpart F income withdrawn from qualified investments (I   |                     |                      | 3                       |          |
| 4      | Previously excluded export trade income withdrawn from investmen   |                     | •                    |                         |          |
|        | Worksheet D in the instructions)   |                     |                      | 4                       |          |
| 5      | Factoring income   |                     |                      | 5                       |          |
| 6      | Total of lines 1 through 5. Enter here and on your income tax return.  |                     |                      | 6                       |          |
| 7      | Dividends received (translated at spot rate on payment date under s  |                     |                      | 7                       |          |
| 8      | Exchange gain or (loss) on a distribution of previously taxed income   |                     |                      | 8                       |          |
|        |  |                     |                      | Yes N                   | ИO       |
|        | ,  |                     |                      |                         |          |
|        | any such income become unblocked during the tax year (see section answer to either question is "Yes." attach an explanation.                 | 904(D))?            |                      | 📙 [                     | Ш        |

Schedule C Line 16 - Other Deductions

| Description       | Functional Currency | U.S. Dollars |
|-------------------|---------------------|--------------|
| Professional fees |                     | 648,303      |
| Commitment fees   |                     | 257,402      |
| Other             |                     | 4,194        |

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Line 4 - Other Current Assets

| Description                               | Beginning of annual accounting period | End of annual accounting period |
|---|---------------------------------------|---------------------------------|
| RECEIVABLE FROM INVESTEE FUNDS            | 61,052,308                            | 28,201,114                      |
| RECEIVABLE FROM AFFILIATED INVESTEE FUNDS | 17,174,857                            | 12,721,271                      |

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Line 7 - Other Investments

| Description                              | Beginning of annual accounting period | End of annual accounting period |
|--|---------------------------------------|---------------------------------|
| INVESTMENTS IN INVESTEE FUNDS            | 668,740,202                           | 522,182,403                     |
| INVESTMENTS IN AFFILIATED INVESTEE FUNDS | 266,023,019                           | 247,527,499                     |

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Line 12 - Other Assets

| Description   | Beginning of annual accounting period | End of annual accounting period |
|---|---------------------------------------|---------------------------------|
| Investment subscription paid in advance to Investee Fund            | 0                                     | 5,900,000                       |
| Investment subscription paid in advance to affiliated Investee Fund | 1,820,000                             | 6,250,000                       |
| Other assets  | 10,000                                | 10,000                          |

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Line 15 - Other Current Liabilities

| Description          | Beginning of annual accounting period | End of annual accounting period |  |
|----------------------|---------------------------------------|---------------------------------|--|
| PAYABLE TO AFFILIATE | 13,970                                | 13,188                          |  |
| INTEREST PAYABLE     | 2,017                                 | 0                               |  |

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Line 17 - Other Liabilities

| Description                      | Beginning of annual accounting period | End of annual accounting period |
|----------------------------------|---------------------------------------|---------------------------------|
| SHAREHOLDER REDEMPTION PAYABLE   | 71,984,850                            | 58,164,099                      |
| BORROWINGS UNDER CREDIT FACILITY | 3,150,000                             | 0                               |

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#### **SCHEDULE 0** (Form 5471)

Organization or Reorganization of Foreign Corporation, and Acquisitions and **Dispositions of its Stock** 

(Rev. December 2012) Department of the Treasury Internal Revenue Service

Name of person filing Form 5471

Name of foreign corporation

THE MCKNIGHT FOUNDATION

BLACKSTONE PARK AVENUE NON-TAXABLE OFFSHORE MASTE

Information about Schedule O (Form 5471) and its instructions is at www.irs.gov/form5471 ► Attach to Form 5471.

EIN (if any)

OMB No. 1545-0704

41-0754835

**BLACKSTONE** 

Reference ID number (see instructions)

Identifying number

| Important: Complete a separate Sche  | dule O for each fo   | reign corp            | oration f | or whic                               | ch informati      | ion must be re  | eported.   | -                                       |   |  |
|--|--|-----------------------|-----------|---------------------------------------|-------------------|---|------------|---|---|--|
| Part I To Be Completed by U  | J.S. Officers and  | Directo               | ors       |                                       |                   |   |            |   |   |  |
| (a)  Name of shareholder for whom acquisition information is reported                  |  | (b)                   |           | (c)<br>Identifying nu<br>of sharehole | mber Date o       | (d)<br>of original<br>cquisition                      |            | (e)<br>e of additional<br>% acquisition |   |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
| Part II  To Be Completed by U  Note: If this return is requi of such persons and the d | red because one o  | or more sh            |           | ers bec                               | ame U.S. p        | ersons, attach  | n a list s | showing                                 | the names   |  |
|  | Section A-C  | eneral S              | hareholo  | der Info                              | ormation          |   |            |   |   |  |
| <b>(a)</b> Name, address, and identifying number of                                    |  | shareholder           |           | (b)<br>S. income                      | e tax return file | -   | las        |   | (c) te (if any) shareholder ast filed information |  |
| shareholder(s) filling this schedule  THE MCKNIGHT FOUNDATION 41-075483                | Type of return (enter form number)  (2)  Date return filed Internal Revenue Service Cent where filed |                       |           |                                       | emer i            | return under section 6046 for the foreign corporation |            |   |   |  |
| 710 SECOND STREET SOUTH, STE 400<br>MINNEAPOLIS, MN 55401                              |  | FORM 990-PF 11/15     |           | 17                                    | E-FILE            |   |            | 11/15/2016                              |   |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
| Section B-U.S  | S. Persons Who A   | re Office             | rs or Dir | ectors                                | of the For        | eign Corpora  | tion       |   | (-1)  |  |
| (a) Name of U.S. officer or director   |  | <b>(b)</b><br>Address |           |                                       | Soc               | (c)<br>cial security numb                             | er         |   | (d)<br>ck appropriate<br>box(es)                  |  |
|  |  |                       |           |                                       |                   |   |            | Offic                                   | cer Director                                      |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
|  |  |                       |           |                                       |                   |   |            |   |   |  |
|  | Sectio   | n C—Acc               | uisition  | of Sto                                | ck                |   |            | •                                       | •   |  |
| (a)  | (b) Class of stock   | (c) Date of           |           | Me                                    | (d)<br>ethod of   | (e)<br>Number of share                                |            |   |   |  |
| Name of shareholder(s) filing this schedule  | acquired ac  |                       |           |                                       | quisition         | (1) (2) Directly Indirec                              |            |   |   |  |
|  |  |                       |           |                                       |                   |   | 1          |   |   |  |

Schedule O (Form 5471) (Rev. 12-2012)

For Paperwork Reduction Act Notice, see the Instructions for Form 5471.

Cat. No. 612000

|  |   |                                      |   |  |                       | . age =                 |
|--|---|--------------------------------------|---|--|-----------------------|-------------------------|
| (f) Amount paid or value given         | (g) Name and address of person from whom shares were acquired |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  | Section   | on D—Disposition                     | of Stock  |  |                       |                         |
| (a)                                    | (b)   | (c)                                  | (d)   | Numbe  | (e)<br>er of shares d | isposed of              |
| Name of shareholder disposing of stock | Class of stock  | Date of disposition                  | Method<br>of disposition                        | (1)<br>Directly  | (2)<br>Indirectly     | y (3)<br>Constructively |
| THE MCKNIGHT FOUNDATION                | COMMON  | 3/24/2017                            | REDEMPTION                                      | 56842  |                       |                         |
|  |   |                                      |   |  |                       |                         |
| <b>(f)</b><br>Amount received          |   | Name and address                     | (g)<br>of person to whom disp                   | osition of stock w   | as made               |                         |
| 118856358                              | BLACKSTONE PA<br>28TH FLOOR NEV                               | RK AVENUE NON-T<br>V YORK, NY, 10154 | AXABLE OFFSHORI                                 | E MASTER FUN   | ID LTD. 345           | PARK AVENUE,            |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
| Sectio                                 | n E–Organizatio   | n or Reorganizati                    | on of Foreign Cor                               | poration   |                       |                         |
| Name                                   | (a)<br>and address of transfe                                 | eror                                 |   | (b) Identifying numb   | per (if any)          | (c)<br>Date of transfer |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
| Assets tra                             | (d)<br>nsferred to foreign corp                               | ooration                             |   | <b>5</b>   | (e)                   |                         |
| (1)<br>Description of assets           | (2)<br>Fair market v  |                                      | (3)<br>pasis (if transferor was<br>U.S. person) | Description of assets transferred by, or notes or<br>securities issued by, foreign corporation |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  |   |                                      |   |  |                       |                         |
|  | Section   | n F—Additional In                    | formation                                       |  |                       |                         |

- (a) If the foreign corporation or a predecessor U.S. corporation filed (or joined with a consolidated group in filing) a U.S. income tax return for any of the last 3 years, attach a statement indicating the year for which a return was filed (and, if applicable, the name of the corporation filing the consolidated return), the taxable income or loss, and the U.S. income tax paid (after all credits).
- **(b)** List the date of any reorganization of the foreign corporation that occurred during the last 4 years while any U.S. person held 10% or more in value or vote (directly or indirectly) of the corporation's stock ▶
- (c) If the foreign corporation is a member of a group constituting a chain of ownership, attach a chart, for each unit of which a shareholder owns 10% or more in value or voting power of the outstanding stock. The chart must indicate the corporation's position in the chain of ownership and the percentages of stock ownership (see instructions for an example).

Schedule O (Form 5471) (Rev. 12-2012)

(Rev. December 2017) Department of the Treasury Internal Revenue Service

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part<br>Name o    | U.S. Transferor Information (see instructions) of transferor  |                               | Identifying number (see instructions)                    |
|-------------------|---|-------------------------------|--|
|                   | MCKNIGHT FOUNDATION   | 41-0754835                    |  |
| 1                 | If the transferor was a corporation, complete questions 1a th   | 1. 0.01000                    |  |
| a<br>b            | If the transfer was a section 361(a) or (b) transfer, was the tror fewer domestic corporations?   | ransferor controlled (under   | Yes 🗌 No   |
|                   | Controlling shareholder   | Ide                           | ntifying number  |
|                   | Controlling charonolder   | 140                           |  |
|                   |   |                               |  |
|                   |   |                               |  |
|                   | If the transferor was a member of an affiliated group fill  | ing a consolidated return     | was it the parent  |
| C                 | 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)(5) been made?   |                               | Yes . No   |
| 2<br>a            | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership.  | e actual transferor (but is r | not treated as such under section 367)                   |
|                   | Name of partnership   | EIN                           | N of partnership   |
| COM               | MONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP   |                               | 20-8306306   |
| b<br>c<br>d       | Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its <b>entire</b> interest in the partnershills the partner disposing of an interest in a limited partners securities market? | ip?                           | Yes V No Yes No On an established Yes V No               |
| Part              |   | ee instructions)              | Tes Mu   |
| 3<br>BOCK         | Name of transferee (foreign corporation)  CAPITAL EU LUXEMBOURG WAG S.A.R.L.  |                               | 4a Identifying number, if any                            |
| <b>5</b><br>40 AV | Address (including country) 'ENUE MONTEREY, RCS LUXEMBOURG, B128.029, LUXEMBOURG  | 6                             | 4b Reference ID number (see instructions)  BockCapital01 |
| 6<br>LU           | Country code of country of incorporation or organization (see   | e instructions)               |  |
| <b>7</b>          | Foreign law characterization (see instructions) PORATION  |                               |  |
| 8                 | Is the transferee foreign corporation a controlled foreign corp   |                               | Yes No   |
| For Pa            | aperwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                            |

2017 Report

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(Rev. December 2017) Department of the Treasury Internal Revenue Service

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o   | of transferor   |                               | Identifying number (see instructions)           |
|----------|---|-------------------------------|---|
| THE N    | MCKNIGHT FOUNDATION   |                               | 41-0754835                                      |
| 1        | If the transferor was a corporation, complete questions 1a th   |                               |   |
| а        | If the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was |                               |   |
|          | or fewer domestic corporations?   |                               |   |
| b        | Did the transferor remain in existence after the transfer? .  |                               | ∐ Yes ∐ No                                      |
|          | If not, list the controlling shareholder(s) and their identifying r   | number(s).                    |   |
|          | Controlling shareholder   | Ide                           | ntifying number                                 |
|          |   |                               |   |
|          |   |                               |   |
|          |   |                               |   |
|          |   |                               |   |
|          |   |                               |   |
|          |   |                               |   |
| С        | If the transferor was a member of an affiliated group fil corporation?  | ing a consolidated return     | , was it the parent<br>□ <b>Yes</b> □ <b>No</b> |
|          | 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)(5) been made?   |                               | Yes . No  |
| d        | nave basis adjustifients under section 307 (a)(3) been made?  |                               | <u> </u> fes   No                               |
| 2        | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is r | not treated as such under section 367           |
| а        | List the name and EIN of the transferor's partnership.  |                               |   |
|          | Name of partnership   | EIN                           | N of partnership                                |
| COM      | MONFUND CAPITAL PRIVATE EQUITY PARTNERS IX, LP  |                               | 36-4778201                                      |
| b        | Did the partner pick up its pro rata share of gain on the trans   | fer of partnership assets?    | Yes 🗹 No  |
| С        | Is the partner disposing of its entire interest in the partnershi   | ip?                           | 🗌 Yes 🗹 No                                      |
| d        | Is the partner disposing of an interest in a limited partners   | ship that is regularly trade  | d on an established                             |
|          | securities market?  |                               | 🗌 Yes 🗹 No                                      |
| Part     |   | ee instructions)              | 1   |
| 3        | Name of transferee (foreign corporation)  |                               | 4a Identifying number, if any                   |
| <b>5</b> | ( CAPITAL EU LUXEMBOURG WAG S.A.R.L.  |                               | 4b Reference ID number                          |
|          | Address (including country)  'ENUE MONTEREY, RCS LUXEMBOURG, B128.029, LUXEMBOURG   | 3                             | (see instructions)                              |
|          |   |                               | BockCapital01                                   |
| <b>6</b> | Country code of country of incorporation or organization (see   | e instructions)               | 1 2225pt.co.                                    |
| 7        | Foreign law characterization (see instructions)   |                               |   |
| 8        | Is the transferee foreign corporation a controlled foreign corp   | ooration?                     | 🗹 Yes 🗌 No                                      |
| For Pa   | aperwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                   |

2017 Report

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Form 926 (Rev. 12-2017) Page **2** 

| Part III Infor  | mation Regarding T   | ransfer of Property                | (see instructions)                              |                               | . 490 =                                      |
|---|--|------------------------------------|---|-------------------------------|--|
|   | sh, Stock, and Secu  |                                    | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                               |  |
| If "Yes," sk  | the only property transfitip the remainder of Par<br>nsferor transfer stock of<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                                   |
| Section B-Prop  | erty qualifying for Acti   | ive Trade or Business              | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                               |  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |  |                                    |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                               |  |
| Talala  |  |                                    |   |                               |  |

Form **926** (Rev. 12-2017)

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

#### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)1/13/2016 EUR 672,606 32,070 32,070 Nonfunctional 1/13/2016 EUR 672,606 233 233 currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 32,303 32,303 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ Any other income recognition provision contained in the above-referenced regulations . . . . . . . . If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B)

Form **926** (Rev. 12-2017)

Property subject to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

**Totals** 

| 13a                              | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |   |
|----------------------------------|--|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> Did the transferor choose to apply the 20-year inclusion period provided under Regulations section  |   |
| Ü                                | 1.367(d)-1(c)(3)(iii) for any intangible property?   |   |
| d                                | If the answer to line 15c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond   |   |
| 16                               | the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$  |   |
| C                                | lemental Part III Information Required To Be Reported (see instructions)   | _ |
|                                  |  |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | Remental Part III Information Required To be Reported (see Instructions)   |   |
|                                  |  |   |
| Part                             |  |   |
|                                  |  |   |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) > IRC 351  |   |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)         |   |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)         |   |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) IRC 351 Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |   |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o   | of transferor  |                               | Identifying number (see instructions)            |
|----------|--|-------------------------------|--|
| THE N    | MCKNIGHT FOUNDATION  |                               | 41-0754835                                       |
| 1        | If the transferor was a corporation, complete questions 1a th  |                               |  |
| а        | If the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?  |                               |  |
| b        | Did the transferor remain in existence after the transfer?   |                               |  |
|          | If not, list the controlling shareholder(s) and their identifying r  |                               |  |
|          |  | 1                             |  |
|          | Controlling shareholder  | Ide                           | ntifying number                                  |
|          |  |                               |  |
|          |  |                               |  |
|          |  |                               |  |
|          |  |                               |  |
|          |  |                               |  |
|          | If the Assertance was a second |                               | Walter or  |
| С        | If the transferor was a member of an affiliated group fil corporation?   |                               | , was it the parent <b>Yes</b> . <b>No</b>       |
|          | 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)(5) been made?  |                               | Yes . No   |
| d        | nave basis adjustments under section 307(a)(3) been made?  |                               | Tes   NO   |
| 2        | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367)           |
| a        | List the name and EIN of the transferor's partnership.   | 1                             |  |
|          | Name of partnership  | EIN                           | l of partnership                                 |
| b        | Did the partner pick up its pro rata share of gain on the trans  | fer of partnership assets?    | Yes . No   |
| С        | Is the partner disposing of its <b>entire</b> interest in the partnersh  | •                             |  |
| d        | Is the partner disposing of an interest in a limited partners  |                               |  |
| Part     | securities market?   |                               | Yes . No   |
| 3        | Name of transferee (foreign corporation)   |                               | 4a Identifying number, if any                    |
| AACP     | TAX-EXEMPT INVESTORS V, L.P.   |                               | 61-1817524                                       |
| 5<br>ONE | Address (including country)<br>MARITIME PLAZA, SUITE 1000 , SAN FRANCISCO, CA 94111  |                               | <b>4b</b> Reference ID number (see instructions) |
| <b>6</b> | Country code of country of incorporation or organization (see  | e instructions)               |  |
| 7        | Foreign law characterization (see instructions) ED PARTNERSHIP   |                               |  |
| 8        | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | · · · · · · · · · · Yes 🗹 No                     |
| For Pa   | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                    |

2017 Report

| Part III Infor  | mation Regarding   | Transfer of Property                                   | (see instructions)                        |                               | . 490 =                               |
|---|--|--|---|-------------------------------|---------------------------------------|
|   | sh, Stock, and Secu  |  | (0.00                                     |                               |                                       |
| Type of property  | (a)<br>Date of<br>transfer   | (b) Description of property                            | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer |
| Cash  | VARIOUS  |  | 180,714                                   |                               |                                       |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |  |   |                               |                                       |
| If "Yes," sk  | the only property transfit the remainder of Parties of Parties of Parties of the remainder of Parties of the remainder of Parties of the Part | rt III and go to Part IV.<br>r securities subject to s | ection 367(a) with respe                  | ect to which a gain           |                                       |
| Section B-Prop  | erty qualifying for Act  | ive Trade or Business                                  | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                           |
| Type of property  | (a) Date of transfer   | (b) Description of property                            | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*      |
| Tangible property<br>(not listed under<br>another category)   |  |  |   |                               |                                       |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |  |  |   |                               |                                       |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |  |   |                               |                                       |
| Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))   |  |  |   |                               |                                       |
| Talala  |  |  |   |                               |                                       |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 13a                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |   |
|------------------------------------|---|---|
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |   |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |   |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |   |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |   |
| b<br>c                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No 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 15c 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) ▶ \$  |   |
| 16                                 | 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)?  |   |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)  | _ |
| Сирр                               | istinctical traction information frequency to be higher to a construction (edge information)  |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
|                                    |   |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| 17<br>18                           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After2.210_%  Type of nonrecognition transaction (see instructions) ► IRC SECTION 351   |   |
| 17<br>18<br>19                     | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After2.210 %  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)  |   |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After2.210 %  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) |   |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After2.210_%  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)  |   |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After2.210_%  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)  |   |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After2.210 %  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) |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o         | of transferor   |                               | Identifying number (see instructions)           |
|----------------|---|-------------------------------|---|
| THE N          | MCKNIGHT FOUNDATION   |                               | 41-0754835                                      |
| 1              | If the transferor was a corporation, complete questions 1a th                                   |                               |   |
| а              | If the transfer was a section 361(a) or (b) transfer, was the tr                                |                               |   |
|                | or fewer domestic corporations?   |                               |   |
| b              | Did the transferor remain in existence after the transfer? .                                    |                               | ∐ Yes ∐ No                                      |
|                | If not, list the controlling shareholder(s) and their identifying n                             | iumber(s).                    |   |
|                | Controlling shareholder   | Ide                           | ntifying number                                 |
|                |   |                               |   |
|                |   |                               |   |
|                |   |                               |   |
|                |   |                               |   |
|                |   |                               |   |
|                |   |                               |   |
| С              | If the transferor was a member of an affiliated group filicorporation?                          | ing a consolidated return     | , was it the parent<br>□ <b>Yes</b> □ <b>No</b> |
|                | If not, list the name and employer identification number (EIN)                                  | of the parent corporation.    |   |
|                | Name of parent corporation  | EIN of                        | parent corporation                              |
|                | Llove basis adjustments under costion 267/a)/E) been made?                                      |                               | Yes . No  |
| d              | Have basis adjustments under section 367(a)(5) been made?                                       |                               | Tes   No  |
| 2              | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. | e actual transferor (but is r | not treated as such under section 367           |
| a              | List the name and EIN of the transferor's partnership.  |                               |   |
|                | Name of partnership   | EIN                           | l of partnership                                |
| PANTI          | HEON MULTI-STRATEGY PROGRAM 2014 (US) LP - INVESTOR SERIES 5                                    |                               | 47-0754835                                      |
| b              | Did the partner pick up its pro rata share of gain on the trans                                 | fer of partnership assets?    | Yes 🗹 No  |
| С              | Is the partner disposing of its entire interest in the partnershi                               | p?                            | 🗌 Yes 🗹 No                                      |
| d              | Is the partner disposing of an interest in a limited partners                                   | ship that is regularly traded | d on an established                             |
|                | securities market?  |                               | 🗌 Yes 🗹 No                                      |
| Part           |   | ee instructions)              |   |
| 3<br>ADVA      | Name of transferee (foreign corporation)  NCED PERSONNEL MANAGEMENT                             |                               | 4a Identifying number, if any                   |
| 5              | Address (including country)   |                               | 4b Reference ID number                          |
|                |   |                               | (see instructions)                              |
|                |   |                               | 1ADVA   |
| <b>6</b><br>AS | Country code of country of incorporation or organization (see                                   | e instructions)               |   |
| <b>7</b>       | Foreign law characterization (see instructions) PORATION  |                               |   |
| 8              | Is the transferee foreign corporation a controlled foreign corp                                 | oration?                      | 🗌 Yes 🗸 No                                      |
| For Pa         | aperwork Reduction Act Notice, see separate instructions.                                       | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                   |

2017 Report

410754835

| Part III Infor  | mation Regarding   | Transfer of Property                                   | (see instructions)                        |                               |                                       |
|---|--|--|---|-------------------------------|---------------------------------------|
|   | sh, Stock, and Secu  |  | (0.00.000000000000000000000000000000000   |                               |                                       |
| Type of property  | (a)<br>Date of<br>transfer   | (b) Description of property                            | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer |
| Cash  | VARIOUS  |  | 100,733                                   |                               |                                       |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |  |   |                               |                                       |
| If "Yes," sk  | the only property transfit the remainder of Parties of Parties of Parties of the remainder of Parties of the remainder of Parties of the Part | rt III and go to Part IV.<br>r securities subject to s | ection 367(a) with respe                  | ect to which a gain           |                                       |
| Section B-Prop  | erty qualifying for Act  | ive Trade or Business                                  | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                           |
| Type of property  | (a) Date of transfer   | (b) Description of property                            | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*      |
| Tangible property<br>(not listed under<br>another category)   |  |  |   |                               |                                       |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |  |   |                               |                                       |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |  |   |                               |                                       |
| Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))   |  |  |   |                               |                                       |
| T. 11.  |  |  |   |                               |                                       |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |  |
|----------------------------------|--|--|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |  |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |  |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |  |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |  |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No 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 15c 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) > \$   |  |
| 16                               | 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)?   |  |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)   |  |
|                                  |  |  |
| Сирр                             | (accompanies to the control of the c |  |
| Сирр                             |  |  |
| Сирр                             |  |  |
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|                                  |  |  |
| Part                             |  |  |
| Part                             | V Additional Information Regarding Transfer of Property (see instructions)   |  |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %   |  |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  Type of nonrecognition transaction (see instructions) \[ \bullet IRC SECTION 351   |  |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |  |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  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)  |  |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  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)  |  |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  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)   |  |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  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)   |  |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  Type of nonrecognition transaction (see instructions) \(\bigsime\) 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)   |  |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  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) .  |  |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.040087 % (b) After0.040087 %  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)  |  |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part              | (  |                                |   |
|-------------------|--|--------------------------------|---|
|                   | f transferor   |                                | Identifying number (see instructions)                   |
|                   | MCKNIGHT FOUNDATION  | rough 1d                       | 41-0754835  |
| 1<br>a            | If the transferor was a corporation, complete questions 1a the lf the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations? | ransferor controlled (under    | section 368(c)) by 5                                    |
| b                 | Did the transferor remain in existence after the transfer? . If not, list the controlling shareholder(s) and their identifying n                             | umber(s).                      | Yes . No  |
|                   | Controlling shareholder  | Ide                            | ntifying number   |
|                   |  |                                |   |
|                   |  |                                |   |
|                   |  |                                |   |
|                   |  |                                |   |
|                   |  |                                |   |
|                   |  |                                |   |
| С                 | If the transferor was a member of an affiliated group fill   | <br>ing a consolidated return, |   |
|                   | corporation?   | of the parent corporation.     | Yes ⊔ No  |
|                   | Name of parent corporation   | EIN of                         | parent corporation                                      |
|                   |  |                                |   |
| d                 | Have basis adjustments under section 367(a)(5) been made?  |                                | Yes No  |
| 2<br>a            | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership.       | e actual transferor (but is r  | not treated as such under section 367),                 |
| a                 | Name of partnership  | EIN                            | N of partnership  |
| TDC A             |  |                                |   |
|                   | ART FIP AIV III, L.P.  |                                | 98-1188789  |
| b<br>b            | Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its <b>entire</b> interest in the partnershi                     | p?                             | Yes   |
| d                 | Is the partner disposing of an interest in a limited partners securities market?   | ship that is regularly traded  | d on an established Yes  V No                           |
| Part              | <u> </u>   | ee instructions)               |   |
| 3<br>AMBA         | Name of transferee (foreign corporation) R INDÚSTRIA   |                                | 4a Identifying number, if any                           |
| <b>5</b><br>RUA 0 | Address (including country)<br>BELSOMINO SAIA, N270, BRAZIL  |                                | <b>4b</b> Reference ID number (see instructions)  1AMBA |
| <b>6</b><br>BR    | Country code of country of incorporation or organization (see  | e instructions)                | IAMIDA  |
| 7                 | Foreign law characterization (see instructions)  |                                |   |
| 8                 | Is the transferee foreign corporation a controlled foreign corp  | oration?                       | Yes 🗹 No  |
| For Pa            | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D                | Form <b>926</b> (Rev. 12-2017)                          |

2017 Report

410754835

| Part III Infor  | mation Regarding T                | ransfer of Property                                | (see instructions)                        |                               | , , , , ,                                    |
|---|-----------------------------------|--|---|-------------------------------|--|
|   | sh, Stock, and Secu               |  | ,   |                               |  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b><br>Description of<br>property           | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  | VARIOUS                           |  | 271,068                                   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |                                   |  |   |                               |  |
| If "Yes," sk  10 Did the training recognition   | agreement was filed?              | t III and go to Part IV. r securities subject to s | ection 367(a) with respe                  |                               | Yes No                                       |
|   | (a)                               |  | exception under Regs                      | (d)                           | (e)  |
| Type of property  | Date of<br>transfer               | <b>(b)</b> Description of property                 | Fair market value on date of transfer     | Cost or other basis           | Gain recognized on transfer*                 |
| Tangible property<br>(not listed under<br>another category)   |                                   |  |   |                               |  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |                                   |  |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |                                   |  |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |                                   |  |   |                               |  |
| Totals  |                                   |  |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 40-                                |  |  |
|------------------------------------|--|--|
| 13a                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |  |
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |  |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |  |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |  |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |  |
| b<br>c                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No 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 15c 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) ▶ \$   |  |
| 16                                 | 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)?   |  |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)   |  |
| Сирр                               | remember at the information required to be reported (see instructions)   |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
|                                    |  |  |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |  |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |  |
| Part                               | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After1.5861 %  |  |
| 17<br>18                           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After1.5861_%  Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351   |  |
| 17<br>18<br>19                     | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After1.5861 %  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)  |  |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After1.5861 %  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) |  |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After1.5861_%  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)  |  |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After1.5861_%  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)  |  |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After1.5861 %  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) |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |

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

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

Attachment

Sequence No. 128

Form **926** (Rev. 12-2017)

OMB No. 1545-0026

▶ Attach to your income tax return for the year of the transfer or distribution. **U.S. Transferor Information** (see instructions) Name of transferor Identifying number (see instructions) THE MCKNIGHT FOUNDATION 41-0754835 If the transferor was a corporation, complete questions 1a through 1d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 **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 . . . . . . . . . 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)(5) 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 2a through 2d. a List the name and EIN of the transferor's partnership. Name of partnership **EIN** of partnership PANTHEON MULTI-STRATEGY PROGRAM 2014 (US) LP - INVESTOR SERIES 5 47-0754835 **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? . . ☐ Yes ✓ No Part II Transferee Foreign Corporation Information (see instructions) 4a Identifying number, if any Name of transferee (foreign corporation) ANCHOR EQUITY PARTNERS FUND II (CAYMAN) FEEDER, LP 98-1249405 Address (including country) 4b Reference ID number 1322, TWO PACIFIC PLACE, QUEENSWAY, HONG KONG (see instructions) Country code of country of incorporation or organization (see instructions) 6 CJ Foreign law characterization (see instructions) 7 **CORPORATION** Is the transferee foreign corporation a controlled foreign corporation? . 🗌 Yes 🗹 No

Cat. No. 16982D

For Paperwork Reduction Act Notice, see separate instructions.

|  | <u>′</u>                                       |                             | / ! 1 1!                                  |                               | 90                               |
|--|--|-----------------------------|---|-------------------------------|----------------------------------|
|  |  | Transfer of Property        | (see instructions)                        |                               |                                  |
| Type of property   | sh, Stock, and Secu<br>(a)<br>Date of          | (b)<br>Description of       | (c)<br>Fair market value on               | (d)<br>Cost or other          | (e)<br>Gain recognized on        |
| Cash   | transfer<br>VARIOUS                            | property                    | date of transfer<br>190,853               | basis                         | transfer                         |
| Stock and  | 77111000                                       |                             | 100,000                                   |                               |                                  |
| securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.    |  |                             |   |                               |                                  |
| 1.367(a)-2(b)(3))  |  |                             |   |                               |                                  |
| 10 Did the trai  | nsferor transfer stock on agreement was filed? | or securities subject to s  | ection 367(a) with respe                  | ect to which a gain           | 🗌 Yes 🗌 No                       |
| Section B-Prop   | erty qualifying for Act                        | ive Trade or Business       | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(      | i) and (ii)                      |
| Type of property   | (a)<br>Date of<br>transfer                     | (b) Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property (not listed under another category)  |  |                             |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f)) |  |                             |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))                                  |  |                             |   |                               |                                  |
| · /\-//  |  |                             |   |                               |                                  |
| Certain tangible property to be  |  |                             |   |                               |                                  |
| leased (see Regs. sec. 1.367(a)-2(e))  |  |                             |   |                               |                                  |
| Tabala   |  |                             |   |                               |                                  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 13a                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |  |
|------------------------------------|---|--|
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |  |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |  |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |  |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |  |
| b<br>c                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No 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 15c 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) ▶ \$  |  |
| 16                                 | 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)?  |  |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)  |  |
| очрр                               | temental Fart in information required to be reported (see instructions)   |  |
|                                    |   |  |
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|                                    |   |  |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part                               | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362_% (b) After0.774362_%  |  |
| 17<br>18                           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  Type of nonrecognition transaction (see instructions) ▶IRC SECTION 351  |  |
| 17<br>18<br>19                     | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.  |  |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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)  |  |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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) |  |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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)  |  |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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) |  |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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)  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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)  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.774362 % (b) After0.774362 %  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)  |  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o           | of transferor   |                               | Identifying number (see instructions)           |
|------------------|---|-------------------------------|---|
| THE N            | MCKNIGHT FOUNDATION   |                               | 41-0754835                                      |
| 1                | If the transferor was a corporation, complete questions 1a th   |                               |   |
| а                | If the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was a section 361(a) or (b) transfer was the transfer was |                               |   |
| _                | or fewer domestic corporations?   |                               |   |
| b                | Did the transferor remain in existence after the transfer? .  |                               | <b>□ Yes □ No</b>                               |
|                  | If not, list the controlling shareholder(s) and their identifying r   | number(s).                    |   |
|                  | Controlling shareholder   | Ide                           | ntifying number                                 |
|                  |   |                               |   |
|                  |   |                               |   |
|                  |   |                               |   |
|                  |   |                               |   |
|                  |   |                               |   |
|                  |   |                               |   |
| С                | If the transferor was a member of an affiliated group fil corporation?  | ing a consolidated return     | , was it the parent<br>□ <b>Yes</b> □ <b>No</b> |
|                  | 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)(5) been made?   |                               | Yes . No  |
| d                | have basis adjustifients under section 507(a)(5) been made?   |                               | <u> </u> fes   No                               |
| 2                | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is r | not treated as such under section 367)          |
| а                | List the name and EIN of the transferor's partnership.  |                               |   |
|                  | Name of partnership   | EIN                           | N of partnership                                |
| COM              | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP   |                               | 20-8306365                                      |
| b                | Did the partner pick up its pro rata share of gain on the trans   | fer of partnership assets?    | Yes 🗹 No  |
| С                | Is the partner disposing of its entire interest in the partnershi   | ip?                           | 🗌 Yes 🗹 No                                      |
| d                | Is the partner disposing of an interest in a limited partners   | ship that is regularly traded | d on an established                             |
|                  | securities market?  |                               | 🗌 Yes 🗹 No                                      |
| Part             | ,   | ee instructions)              | 1   |
| 3<br>ATLA        | Name of transferee (foreign corporation) NTIS INTERNATIONAL HOLDING SARL  |                               | 4a Identifying number, if any                   |
| 5                | Address (including country)   |                               | 4b Reference ID number                          |
| 2 AVE            | NUE, CHARLES DE GAULLE, L-1653, LUXEMBOURG  |                               | (see instructions)                              |
|                  |   |                               | 1ATLA   |
| 6<br>LU          | Country code of country of incorporation or organization (see   | e instructions)               |   |
| <b>7</b><br>CORF | Foreign law characterization (see instructions) PORATION  |                               |   |
| 8                | Is the transferee foreign corporation a controlled foreign corp   | ooration?                     | 🗌 Yes 🗸 No                                      |
| For Pa           | aperwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                   |

1

2017 Report

| Part III Infor  | mation Regarding T   | ransfer of Property                | (see instructions)                              |                               | . 490 =                                      |
|---|--|------------------------------------|---|-------------------------------|--|
|   | sh, Stock, and Secu  |                                    | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                               |  |
| If "Yes," sk  | the only property transfitip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                                   |
| Section B-Prop  | erty qualifying for Acti   | ive Trade or Business              | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                               |  |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |                                    |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                               |  |
| Talala  |  |                                    |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 215 215 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 215 215 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |   |
|---|--|---|
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |   |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |   |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes No  No  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 15c 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) ▶ \$   |   |
| 16  | 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)?   |   |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)   | _ |
| oupp  | remember at the information required to be reported (see instructions)   | _ |
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| Part  | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351   |   |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶ _IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.000 %  Type of nonrecognition transaction (see instructions) IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.000 %  Type of nonrecognition transaction (see instructions) IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part        | ,  |                               |  |
|-------------|--|-------------------------------|--|
|             | f transferor   |                               | Identifying number (see instructions)            |
|             | MCKNIGHT FOUNDATION  | annuale del                   | 41-0754835                                       |
| 1<br>a<br>b | Did the transferor remain in existence after the transfer? .   | ransferor controlled (under   | Yes . No   |
|             | If not, list the controlling shareholder(s) and their identifying r  | number(s).                    |  |
|             | Controlling shareholder  | Ide                           | ntifying number                                  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
| С           | If the transferor was a member of an affiliated group fill corporation?  | ing a consolidated return,    | , was it the parent                              |
|             | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |
|             | Name of parent corporation   | EIN of                        | parent corporation                               |
|             |  |                               |  |
| d           | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No   |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367),          |
| a           | List the name and EIN of the transferor's partnership.   | T                             |  |
|             | Name of partnership  | EIN                           | l of partnership                                 |
| COM         | MONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP  |                               | 20-8306306                                       |
| b           | Did the partner pick up its pro rata share of gain on the trans<br>Is the partner disposing of its <b>entire</b> interest in the partnersh |                               | Yes 🗹 No   |
| c<br>d      | Is the partner disposing of an interest in a limited partners  | •                             | <del>-</del> -                                   |
| Dout        | securities market?   |                               | Yes 🗹 No   |
| Part<br>3   | Name of transferee (foreign corporation)   | ee instructions)              | 4a Identifying number, if any                    |
|             | CONVERGENCE TECHNOLOGIES PRIVATE LIMITED   |                               | +a identifying number, if any                    |
|             | Address (including country) AN EXPRESS BUILDING, 2 FLOOR NO. 1 QUEENS ROA  | D BANGALORE,                  | <b>4b</b> Reference ID number (see instructions) |
| KARI<br>6   | NATAKA, 560001, INDIA  Country code of country of incorporation or organization (see   | e instructions)               | 1ATRI  |
| IN 7        | · · · · · · · · · · · · · · · · · · ·  | ,                             |  |
| =           | Foreign law characterization (see instructions)  |                               |  |
| 8           | Is the transferee foreign corporation a controlled foreign corp  |                               | · · · · · · □ Yes ☑ No                           |
| For Pa      | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |

1

410754835

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

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

OMB No. 1545-0026 Attachment Sequence No. 128

| Part        | ,  | · · · · · · · · · · · · · · · · · · · |   |
|-------------|--|---------------------------------------|---|
|             | f transferor   |                                       | Identifying number (see instructions)                         |
|             | MCKNIGHT FOUNDATION  |                                       | 41-0754835  |
| 1<br>a<br>b | Did the transferor remain in existence after the transfer? .   | ransferor controlled (under           | Yes . No  |
|             | If not, list the controlling shareholder(s) and their identifying r  | number(s).                            |   |
|             | Controlling shareholder  | Ide                                   | ntifying number   |
|             |  |                                       |   |
|             |  |                                       |   |
|             |  |                                       |   |
|             |  |                                       |   |
|             |  |                                       |   |
|             |  |                                       |   |
|             |  |                                       |   |
| С           | If the transferor was a member of an affiliated group fill corporation?  | ling a consolidated return,           | , was it the parent Yes . No                                  |
|             | If not, list the name and employer identification number (EIN)   | of the parent corporation.            |   |
|             | Name of parent corporation   | EIN of                                | parent corporation  |
|             |  |                                       |   |
| d           | Have basis adjustments under section 367(a)(5) been made?  |                                       | Yes . No  |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r         | not treated as such under section 367),                       |
| a           | List the name and EIN of the transferor's partnership.   | 1                                     |   |
|             | Name of partnership  | EIN                                   | l of partnership  |
| COM         | MONFUND CAPITAL PRIVATE EQUITY PARTNERS IX, LP   |                                       | 36-4778201  |
| b           | Did the partner pick up its pro rata share of gain on the trans<br>Is the partner disposing of its <b>entire</b> interest in the partnersh | · ·                                   | Yes 🗹 No  |
| c<br>d      | Is the partner disposing of an interest in a limited partners  | •                                     | d on an established   |
| Part        | securities market?   |                                       | Yes 🗸 No  |
| 3           | Name of transferee (foreign corporation)   | ee manuchonaj                         | 4a Identifying number, if any                                 |
| ATRIA       | CONVERGENCE TECHNOLOGIES PRIVATE LIMITED   |                                       | <b>3</b> 1 1 1 <b>3</b> 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 |
|             | Address (including country) AN EXPRESS BUILDING, 2 FLOOR NO. 1 QUEENS ROA  | D BANGALORE,                          | <b>4b</b> Reference ID number (see instructions)              |
| 6           | NATAKA, 560001, INDIA  Country code of country of incorporation or organization (see   | e instructions)                       | 1ATRI   |
| <u>N</u> 7  | Foreign law characterization (see instructions)  |                                       |   |
|             | PORATION   |                                       |   |
| 8<br>For Po | Is the transferee foreign corporation a controlled foreign corp  |                                       | Yes V No  Form <b>926</b> (Rev. 12-2017)                      |
| ror Pa      | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D                       | Form <b>320</b> (Rev. 12-2017)                                |

2017 Report

410754835

| Part III Infor  | mation Regarding T                | ransfer of Property                                 | (see instructions)                               |                               | , ,  |
|---|-----------------------------------|---|--|-------------------------------|--|
| Section A—Cas   | sh, Stock, and Secui              | rities  |  |                               |  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b><br>Description of<br>property            | <b>(c)</b> Fair market value on date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |                                   |   |  |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |                                   |   |  |                               |  |
| If "Yes," sk  10 Did the training recognition   | agreement was filed?              | t III and go to Part IV. r securities subject to so | ection 367(a) with respe                         |                               | . ☐ Yes ☑ No . ☐ Yes ☑ No                    |
| Type of property  | (a) Date of transfer              | <b>(b)</b> Description of property                  | (c) Fair market value on date of transfer        | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   | 2015                              | Property  |  |                               |  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |                                   |   |  |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |                                   |   |  |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |                                   |   |  |                               |  |
| Totals  |                                   |   |  |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)5/6/2016 INR 83,269,185 744 744 Nonfunctional 5/6/2016 INR 83,269,185 5 5 currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 749 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 🗌 Yes 🔽 No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B)

Form **926** (Rev. 12-2017)

Property subject to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |   |
|----------------------------------|--|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> Did the transferor choose to apply the 20-year inclusion period provided under Regulations section  |   |
| Ü                                | 1.367(d)-1(c)(3)(iii) for any intangible property?   |   |
| d                                | If the answer to line 15c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond   |   |
| 16                               | the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$  |   |
| C                                | lemental Part III Information Required To Be Reported (see instructions)   | _ |
|                                  |  |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | remental Part III Information Required To be Reported (see Instructions)   |   |
| Supp                             | Remental Part III Information Required To be Reported (see Instructions)   |   |
|                                  |  |   |
| Part                             |  |   |
|                                  |  |   |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) > IRC 351  |   |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)         |   |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)         |   |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) IRC 351 Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |   |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Part        | ,   |                               |  |
|-------------|---|-------------------------------|--|
|             | f transferor<br>ICKNIGHT FOUNDATION   |                               | Identifying number (see instructions) 41-0754835 |
| 1           | If the transferor was a corporation, complete questions 1a th                                   | rough 1d                      | 41-0754655                                       |
| a<br>b      | If the transfer was a section 361(a) or (b) transfer, was the tror fewer domestic corporations? | ransferor controlled (under   |  |
|             | Controlling shareholder   | Ide                           | ntifying number                                  |
|             | <u> </u>  |                               |  |
|             |   |                               |  |
|             |   |                               |  |
|             |   |                               |  |
|             |   |                               |  |
|             |   |                               |  |
|             |   |                               |  |
| С           | If the transferor was a member of an affiliated group fill corporation?                         | ng a consolidated return,     | was it the parent                                |
|             | If not, list the name and employer identification number (EIN)                                  | of the parent corporation.    |  |
|             | Name of parent corporation  | EIN of                        | parent corporation                               |
|             |   |                               |  |
| d           | Have basis adjustments under section 367(a)(5) been made?                                       |                               | Yes . No   |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. | e actual transferor (but is n | not treated as such under section 367),          |
| a           | List the name and EIN of the transferor's partnership.  | -11                           |  |
|             | Name of partnership   | EIN                           | I of partnership                                 |
| BLAC        | KSTONE PARK AVENUE NON-TAXABLE FUND L.P.  |                               | 13-4032108                                       |
| b           | Did the partner pick up its pro rata share of gain on the trans                                 |                               | Yes 🗹 No   |
| C           | Is the partner disposing of its <b>entire</b> interest in the partnershi                        |                               | Yes 🗹 No   |
| d           | Is the partner disposing of an interest in a limited partners securities market?                | , ,                           | on an established                                |
| Part        |   |                               |  |
| 3           | Name of transferee (foreign corporation)  |                               | 4a Identifying number, if any                    |
|             | KSTONE PARK AVENUE NON-TAXABLE OFFSHORE MASTER FUN  | ID LTD                        | 41.5 ( 15 1                                      |
|             | Address (including country)<br>FHE BLACKSTONE GROUP, 345 PARK AVENUE, 28TH F<br>YORK 10154      | FLOOR, NEW YORK,              | 4b Reference ID number (see instructions)        |
| <b>6</b> CJ | Country code of country of incorporation or organization (see                                   | e instructions)               | BlackstoneParkAve0001                            |
| 7           | Foreign law characterization (see instructions)   |                               |  |
| 8           | ORATION  Is the transferee foreign corporation a controlled foreign corp                        | oration?                      | Yes No   |
|             | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |

For Paperwork Reduction Act Notice, see separate instructions.

2017 Report

Cat. No. 16982D

| Part III Infor  | mation Regarding T                | ransfer of Property                                | (see instructions)                        |                               | , , , , ,                                    |
|---|-----------------------------------|--|---|-------------------------------|--|
|   | sh, Stock, and Secu               |  | ,   |                               |  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b> Description of property                 | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  | VARIOUS                           |  | 271,905                                   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |                                   |  |   |                               |  |
| If "Yes," sk  10 Did the training recognition   | agreement was filed?              | t III and go to Part IV. r securities subject to s | ection 367(a) with respe                  |                               | Yes No                                       |
|   | (a)                               |  | exception under Regs                      | (d)                           | (e)  |
| Type of property  | Date of<br>transfer               | <b>(b)</b> Description of property                 | Fair market value on date of transfer     | Cost or other basis           | Gain recognized on transfer*                 |
| Tangible property<br>(not listed under<br>another category)   |                                   |  |   |                               |  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |                                   |  |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |                                   |  |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |                                   |  |   |                               |  |
| Totals  |                                   |  |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 120                                |  |   |
|------------------------------------|--|---|
| ısa                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |   |
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |   |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |   |
| b<br>b                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No 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 15c 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) ▶ \$   |   |
| 16                                 | 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)?   |   |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)   |   |
| очрр                               | iomentari arem information ricquirea to be ricportea (see metaectorio)   | _ |
|                                    |  |   |
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|                                    |  |   |
|                                    |  |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part<br>17                         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| 17<br>18                           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ► IRC SECTION 351   |   |
| 17<br>18<br>19                     | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.  |   |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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)  |   |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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) |   |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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)  |   |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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) |   |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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)  |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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) |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before12.000 % (b) After0.000 %  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)  |   |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o      | of transferor  |                               | Identifying number (see instructions)                  |
|-------------|--|-------------------------------|--|
| THE N       | MCKNIGHT FOUNDATION  |                               | 41-0754835   |
| 1           | If the transferor was a corporation, complete questions 1a th  | rough 1d.                     |  |
| а           | If the transfer was a section 361(a) or (b) transfer, was the tr   | ransferor controlled (under   | section 368(c)) by 5                                   |
|             | or fewer domestic corporations?  |                               |  |
| b           | Did the transferor remain in existence after the transfer? .   |                               | Yes . No   |
|             | If not, list the controlling shareholder(s) and their identifying r  | number(s).                    |  |
|             | Controlling shareholder  | Ide                           | ntifying number  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
|             |  |                               |  |
| С           | If the transferor was a member of an affiliated group fill corporation?  | ing a consolidated return,    | , was it the parent                                    |
|             | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |
|             | Name of parent corporation   | EIN of                        | parent corporation                                     |
|             | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No   |
| d           | have basis adjustifients under section 507(a)(5) been made?  |                               | Tes   NO   |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367)                 |
| а           | List the name and EIN of the transferor's partnership.   |                               |  |
|             | Name of partnership  | EIN                           | l of partnership                                       |
| COM         | MONFUND CAPITAL VENTURE PARTNERS XI  |                               | 47-2004432   |
| b           | Did the partner pick up its pro rata share of gain on the trans  | fer of partnership assets?    | <b>Yes</b> 🗹 No  |
| С           | Is the partner disposing of its entire interest in the partnershi  | p?                            | Yes 🗹 No   |
| d           | Is the partner disposing of an interest in a limited partners  | ship that is regularly traded | d on an established                                    |
|             | securities market?   | <u> </u>                      | 🗌 Yes 🗹 No   |
| Part        | ,  | ee instructions)              |  |
| 3           | Name of transferee (foreign corporation)   |                               | 4a Identifying number, if any                          |
|             | DANCE LTD  |                               |  |
|             | Address (including country)<br>SHORE INCORPORATIONS (CAYMAN) LIMITED, FLOOR 4, W<br>ARE, P.O. BOX 2804, GRAND CAYMAN, KY1-1112, CAYMAN I |                               | 4b Reference ID number (see instructions)  BYTEDANCE01 |
| <b>6</b> CJ | Country code of country of incorporation or organization (see  | e instructions)               |  |
| 7           | Foreign law characterization (see instructions)  |                               |  |
| 8           | Is the transferee foreign corporation a controlled foreign corp  | oration?                      | Yes 🗹 No   |
| For Pa      | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                          |

2017 Report

| 1 01111 920 (HeV. 12-201   | <u>'</u>  |                             |   |                               | raye Z   |
|--|---|-----------------------------|---|-------------------------------|--|
|  |   | Transfer of Property        | (see instructions)                        |                               |  |
|  | sh, Stock, and Secu   |                             | (c)                                       | (d)                           | (e)  |
| Type of property   | Date of transfer  | (b) Description of property | Fair market value on date of transfer     | Cost or other basis           | Gain recognized on transfer                      |
| Cash   | 11/25/2016  |                             | 143,533                                   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible       |   |                             |   |                               |  |
| property under<br>Regs. sec.<br>1.367(a)-2(b)(3))                              |   |                             |   |                               |  |
| If "Yes," sk   | the only property transitip the remainder of Pa<br>nesteror transfer stock of<br>agreement was filed? | rt III and go to Part IV.   | ection 367(a) with respe                  | ect to which a gain           | ☑ Yes ☐ No                                       |
| Section B—Prop   | erty qualifying for Act   | tive Trade or Business      | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | and (ii)   |
| Type of property   | (a)<br>Date of<br>transfer  | (b) Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*                 |
| Tangible property<br>(not listed under<br>another category)                    |   |                             |   |                               |  |
| Working interest in oil and gas property                                       |   |                             |   |                               |  |
| (as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |   |                             |   |                               |  |
| Financial asset (as described in Regs.   |   |                             |   |                               |  |
| sec. 1.367(a)-<br>2(b)(3))   |   |                             |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e)) |   |                             |   |                               |  |
|  |   |                             |   |                               | <del>                                     </del> |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 13a   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |
|---|--|
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes No  No  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 15c 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) ▶ \$   |
| 16  | 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)?   |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)   |
| oupp  | remember are in information required to be reported (see instructions)   |
|   |  |
|   |  |
|   |  |
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|   |  |
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|   |  |
|   |  |
|   |  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)   |
| Part<br>17                                      | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.030 %  Type of nonrecognition transaction (see instructions) ▶IRC 351   |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.030 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.030 %  Type of nonrecognition transaction (see instructions) ▶ _IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.030_%  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.030 %  Type of nonrecognition transaction (see instructions) IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.030 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.030 %  Type of nonrecognition transaction (see instructions) IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part      | (  |                               | Identification number (no. :ttt                  |  |  |
|-----------|--|-------------------------------|--|--|--|
|           | f transferor<br>//CKNIGHT FOUNDATION   |                               | Identifying number (see instructions) 41-0754835 |  |  |
| 1         |  |                               |  |  |  |
| a         | 1511 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1   |                               |  |  |  |
| b         | Did the transferor remain in existence after the transfer?   |                               |  |  |  |
|           | Controlling shareholder  | Identifying number            |  |  |  |
|           |  |                               |  |  |  |
|           |  |                               |  |  |  |
|           |  |                               |  |  |  |
|           |  |                               |  |  |  |
|           |  |                               |  |  |  |
|           | If the Association was a second or of the office of the second of the other second or of th |                               | Walley was a                                     |  |  |
| С         | If the transferor was a member of an affiliated group filicorporation?   |                               | was it the parent                                |  |  |
|           | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |  |  |
|           | Name of parent corporation   | EIN of parent corporation     |  |  |  |
|           |  |                               |  |  |  |
| d         | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No   |  |  |
| 2         | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is n | not treated as such under section 367),          |  |  |
| а         | List the name and EIN of the transferor's partnership.   |                               |  |  |  |
|           | Name of partnership  | EIN                           | l of partnership                                 |  |  |
| COMN      | MONFUND CAPITAL PRIVATE EQUITY PARTNERS VI, LP   |                               | 16-1720029                                       |  |  |
| b<br>c    |  |                               |  |  |  |
| d         |  |                               |  |  |  |
| Part      |  | e instructions)               |  |  |  |
| 3<br>COUB | Name of transferee (foreign corporation)  SICACIONES Y NEGOCIACIONES EXCLUSIVAS S.A.P.I. DE C.V.   |                               | 4a Identifying number, if any                    |  |  |
|           | Address (including country)  ROBLE 300 INTERIOR 701 PISO 7 COLONIA VALLE, SAN PEDRO GARZA  |                               | 4b Reference ID number (see instructions)        |  |  |
| 6<br>MX   | CCIA, NUEVO LEON, NUEVOLEON, 66265, MEXICO  Country code of country of incorporation or organization (see instructions)  |                               |  |  |  |
| 7         | Foreign law characterization (see instructions)  |                               |  |  |  |
| 8         | Is the transferee foreign corporation a controlled foreign corp  | oration?                      | · · · · · · · · · · · · · · · Yes   No           |  |  |
| For Pa    | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |  |  |

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

OMB No. 1545-0026

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

Attachment Sequence No. 128

| Part   | U.S. Transferor Information (see instructions)  |                                       |  |  |  |                            |
|--|---|---------------------------------------|--|--|--|----------------------------|
|  | f transferor  | Identifying number (see instructions) |  |  |  |                            |
|  | THE MCKNIGHT FOUNDATION 41-07548  |                                       |  |  |  |                            |
| 1<br>a<br>b  | If the transferor was a corporation, complete questions 1a through 1d.  If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or fewer domestic corporations? |                                       |  |  |  |                            |
|  | 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? |   |                                       |  |  |  |                            |
|  |   |                                       |  |  |  | Name of parent corporation |
|  |   |                                       |  |  |  |                            |
| d  | Have basis adjustments under section 367(a)(5) been made?   |                                       | Yes . No                               |  |  |                            |
| 2  | 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 2a through 2d.   |                                       |  |  |  |                            |
| a  | List the name and EIN of the transferor's partnership.  |                                       |  |  |  |                            |
|  | Name of partnership   | EIN of partnership                    |  |  |  |                            |
| COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP   |   |                                       | 20-8306306                             |  |  |                            |
| b  | b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?   |                                       |  |  |  |                            |
| C  |   |                                       |  |  |  |                            |
| d  | Is the partner disposing of an interest in a limited partners securities market?  | ship that is regularly traded         | d on an established<br><b>Yes ✓ No</b> |  |  |                            |
| Part   |   | ee instructions)                      |  |  |  |                            |
| 3<br>COUE  | Name of transferee (foreign corporation)  ICACIONES Y NEGOCIACIONES EXCLUSIVAS S.A.P.I. DE C.V.   |                                       | 4a Identifying number, if any          |  |  |                            |
| 5_   | 3   |                                       | 4b Reference ID number                 |  |  |                            |
|  | /E. ROBLE 300 INTERIOR 701 PISO 7 COLONIA VALLE, SAN PEDRO GARZ/<br>ARCIA, NUEVO LEON, NUEVOLEON, 66265, MEXICO   |                                       | (see instructions)  COUBICACIONES01    |  |  |                            |
| <b>6</b> MX  | Country code of country of incorporation or organization (see   | e instructions)                       | - COODIO NOIONEOUT                     |  |  |                            |
| 7  | Foreign law characterization (see instructions)   |                                       |  |  |  |                            |
| 8  | Is the transferee foreign corporation a controlled foreign corp   | ooration?                             | · · · · · · · · · · · · · · · Yes   No |  |  |                            |
| For Pa   | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D                       | Form <b>926</b> (Rev. 12-2017)         |  |  |                            |

2017 Report

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part             | (  |                               |   |
|------------------|--|-------------------------------|---|
|                  | f transferor   |                               | Identifying number (see instructions)     |
|                  | ICKNIGHT FOUNDATION  |                               | 41-0754835                                |
| 1<br>a           | If the transferor was a corporation, complete questions 1a the lift the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations? | ansferor controlled (under    | section 368(c)) by 5                      |
| b                | Did the transferor remain in existence after the transfer?  If not, list the controlling shareholder(s) and their identifying n                                |                               | Yes . No                                  |
|                  | Controlling shareholder  | Ide                           | ntifying number                           |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
|                  |  |                               |   |
| С                | If the transferor was a member of an affiliated group filicorporation?   | ng a consolidated return,     | was it the parent                         |
|                  | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |   |
|                  | Name of parent corporation   | EIN of                        | parent corporation                        |
|                  |  |                               |   |
| d                | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes No                                    |
| -                |  |                               |   |
| 2                | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is n | not treated as such under section 367),   |
| а                | List the name and EIN of the transferor's partnership.   | I                             |   |
|                  | Name of partnership  | EIN                           | l of partnership                          |
| COMM             | MONFUND CAPITAL PRIVATE EQUITY PARTNERS IX, LP   |                               | 36-4778201                                |
| b                | Did the partner pick up its pro rata share of gain on the trans-   |                               | Yes 🗹 No                                  |
| Q<br>C           | Is the partner disposing of its <b>entire</b> interest in the partnershills the partner disposing of an interest in a limited partners                         | •                             | Yes ✓ No                                  |
| d                | securities market?   |                               | on an established Yes 🗹 No                |
| Part             | <u> </u>   | e instructions)               |   |
| 3<br>COUB        | Name of transferee (foreign corporation) ICACIONES Y NEGOCIACIONES EXCLUSIVAS S.A.P.I. DE C.V.   |                               | 4a Identifying number, if any             |
| 5<br>AVE.        | Address (including country) ROBLE 300 INTERIOR 701 PISO 7 COLONIA VALLE, SACIA, NUEVO LEON, NUEVOLEON, 66265, MEXICO   | AN PEDRO GARZA                | 4b Reference ID number (see instructions) |
| 6                | Country code of country of incorporation or organization (see  | e instructions)               | COUBICACIONES01                           |
| MX               |  | ,                             |   |
| <b>7</b><br>CORP | Foreign law characterization (see instructions) ORATION  |                               |   |
| 8                | Is the transferee foreign corporation a controlled foreign corp  | oration?                      | 🗸 Yes 🗌 No                                |
| For Pa           | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)            |

Cat. No. 16982D

| 1 01111 320 (Nev. 12-201  | ,   |                                    |   |                               | rage <b>z</b>                    |
|---|---|------------------------------------|---|-------------------------------|----------------------------------|
|   |   | ransfer of Property                | (see instructions)                        |                               |                                  |
| Type of   | sh, Stock, and Secu<br>(a)<br>Date of   | (b) Description of                 | (c)<br>Fair market value on               | (d)<br>Cost or other          | (e)<br>Gain recognized on        |
| property  | transfer  | property                           | date of transfer                          | basis                         | transfer                         |
| Cash  |   |                                    |   |                               |                                  |
| Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3)) |   |                                    |   |                               |                                  |
| If "Yes," sk  | the only property transf<br>kip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                  | ect to which a gain           | □ Yes ☑ No                       |
| Section B—Prop  | erty qualifying for Act   | ive Trade or Business              | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                      |
| Type of property  | <b>(a)</b><br>Date of<br>transfer   | <b>(b)</b> Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property<br>(not listed under<br>another category)   |   |                                    |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))              |   |                                    |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |   |                                    |   |                               |                                  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))                              |   |                                    |   |                               |                                  |
| Totals  |   |                                    |   |                               |                                  |

\* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS MEXICAN PESO** 231 231 Nonfunctional **VARIOUS MEXICAN PESO** 476 476 currency, etc. (as described in Regs. **VARIOUS** 4 **MEXICAN PESO** 4 sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 711 711 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 🗌 Yes 🔽 No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions)

Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5) **Totals** 

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |   |
|----------------------------------|--|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section $1.367(a)-1(b)(5)$ ?   |   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 15a                              | Did the transfer any intangible property that, at the time of the transfer, had a useful life  |   |
| b                                | reasonably anticipated to exceed twenty years?   |   |
| 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 15c 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) > \$   |   |
| 16                               | Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?   |   |
|                                  |  | _ |
| Supp                             | emental Part III Information Required To be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |   |
|                                  |  |   |
| Part                             |  |   |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part<br>17<br>18                 | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part<br>17<br>18<br>19<br>a      | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part<br>17<br>18<br>19<br>a<br>b | M Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) ► IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3). |   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) ► IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)    |   |
| 17<br>18<br>19<br>a<br>b<br>c    | M Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) ► IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) ► IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)    |   |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) IRC 351 Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)       |   |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part               | \   |                               | Identifying number (acc instructions)            |
|--------------------|---|-------------------------------|--|
|                    | f transferor<br>ICKNIGHT FOUNDATION   |                               | Identifying number (see instructions) 41-0754835 |
| 1                  | If the transferor was a corporation, complete questions 1a th   | rough 1d.                     | 11 0704000                                       |
| а                  | If the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?   | ransferor controlled (under   |  |
| b                  | Did the transferor remain in existence after the transfer? . If not, list the controlling shareholder(s) and their identifying r        |                               | Yes . No   |
|                    | Controlling shareholder   | Ide                           | ntifying number                                  |
|                    |   |                               |  |
|                    |   |                               |  |
|                    |   |                               |  |
|                    |   |                               |  |
|                    |   |                               |  |
| С                  | If the transferor was a member of an affiliated group fil corporation?  | ing a consolidated return,    | was it the parent                                |
|                    | If not, list the name and employer identification number (EIN)  | of the parent corporation.    |  |
|                    | Name of parent corporation  | EIN of                        | parent corporation                               |
|                    |   |                               |  |
| d                  | Have basis adjustments under section 367(a)(5) been made?   |                               | Yes . No   |
| 2                  | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is n | not treated as such under section 367),          |
| a                  | List the name and EIN of the transferor's partnership.  | FIN                           | Lafar and a suplific                             |
|                    | Name of partnership   | EIN                           | I of partnership                                 |
| TPG A              | RT FIP AIV III, L.P.  |                               | 98-1188789                                       |
| b                  | Did the partner pick up its pro rata share of gain on the trans   |                               | Yes 🗸 No   |
| c<br>d             | Is the partner disposing of its <b>entire</b> interest in the partnership is the partner disposing of an interest in a limited partners | •                             | Yes V No   |
|                    | securities market?  |                               | □ V □ N-   |
| Part               |   | ee instructions)              |  |
| 3<br>EBES          | Name of transferee (foreign corporation) SISTEMAS DE ENERGIA S.A.EBES SISTEMAS DE ENERGIA S.A.  |                               | 4a Identifying number, if any                    |
| <b>5</b><br>AV. AI | Address (including country)<br>LEXANDER GRAHAM BELL, 200, BRAZIL  |                               | <b>4b</b> Reference ID number (see instructions) |
|                    |   |                               | 5EBES  |
| 6<br>BR            | Country code of country of incorporation or organization (see   | e instructions)               |  |
| <b>7</b><br>CORP   | Foreign law characterization (see instructions) ORATION   |                               |  |
| 8                  | Is the transferee foreign corporation a controlled foreign corp   | ooration?                     | · · · · · · · · · · Yes 🗹 No                     |
| For Pa             | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |

|  | <del></del>   |   | /   |                               | . 190 =                               |
|--|---|---|---|-------------------------------|---------------------------------------|
|  | mation Regarding T  |   | (see instructions)                        |                               |                                       |
| Section A—Cas  | sh, Stock, and Secu   | rities  |   |                               |                                       |
| Type of property   | (a)<br>Date of<br>transfer  | (b) Description of property                           | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer |
| Cash   | VARIOUS   |   | 418,506                                   |                               |                                       |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible                       |   |   |   |                               |                                       |
| property under<br>Regs. sec.<br>1.367(a)-2(b)(3))  |   |   |   |                               |                                       |
| If "Yes," sk   | the only property transf<br>kip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.<br>r securities subject to s | ection 367(a) with respe                  | ect to which a gain           |                                       |
| Section B-Prop   | erty qualifying for Act   | ive Trade or Business                                 | exception under Regs                      | s. sec. 1.367(a)-2(a)(2)(i    | i) and (ii)                           |
| Type of property   | (a)<br>Date of<br>transfer  | (b) Description of property                           | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*      |
| Tangible property<br>(not listed under<br>another category)                                    |   |   |   |                               |                                       |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f)) |   |   |   |                               |                                       |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))                                  |   |   |   |                               |                                       |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))                 |   |   |   |                               |                                       |
| Totals   |   |   |   |                               |                                       |

\* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 120   |   |  |
|---|---|--|
| ısa   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |  |
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |  |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |  |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   |  |
|   | 1.367(d)-1(c)(3)(ii) for any intangible property?   |  |
| d   | If the answer to line 15c 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) ▶ \$  |  |
| 16  | 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)?  |  |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)  |  |
| оирр  | remember at the information required to be responsed (see instructions)   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
|   |   |  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part<br>17                                      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614_% (b) After1.8614_%  |  |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  |  |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.  |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  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)  |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  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) |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  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) |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  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) |  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.8614 % (b) After1.8614 %  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)  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o           | of transferor   |                               | Identifying number (see instructions)  |
|------------------|---|-------------------------------|--|
| THE N            | MCKNIGHT FOUNDATION   |                               | 41-0754835                             |
| 1                | If the transferor was a corporation, complete questions 1a th   |                               |  |
| а                | If the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer. |                               |  |
|                  | or fewer domestic corporations?   |                               |  |
| b                | Did the transferor remain in existence after the transfer? .  |                               | ∐ Yes ∐ No                             |
|                  | If not, list the controlling shareholder(s) and their identifying r   | number(s).                    |  |
|                  | Controlling shareholder   | Ide                           | ntifying number                        |
|                  |   |                               |  |
|                  |   |                               |  |
|                  |   |                               |  |
|                  |   |                               |  |
|                  |   |                               |  |
|                  |   |                               |  |
| С                | If the transferor was a member of an affiliated group fil corporation?  | ing a consolidated return     | , was it the parent                    |
|                  | If not, list the name and employer identification number (EIN)  | of the parent corporation.    |  |
|                  | Name of parent corporation  | EIN of                        | parent corporation                     |
|                  | Lleve le seis editories este conden e etien 007/eV/f) le ser conde  |                               | □ V □ N.                               |
| d                | Have basis adjustments under section 367(a)(5) been made?   |                               | Yes . No                               |
| 2                | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is r | not treated as such under section 367) |
| а                | List the name and EIN of the transferor's partnership.  |                               |  |
|                  | Name of partnership   | EIN                           | l of partnership                       |
| COM              | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP   |                               | 20-8306365                             |
| b                | Did the partner pick up its pro rata share of gain on the trans   | fer of partnership assets?    | Yes 🗹 No                               |
| С                | Is the partner disposing of its entire interest in the partnershi   | ip?                           | 🗌 Yes 🗹 No                             |
| d                | Is the partner disposing of an interest in a limited partners   |                               |  |
|                  | securities market?  |                               | Yes 🗹 No                               |
| Part             | ,   | ee instructions)              | T                                      |
| <b>3</b><br>EURC | Name of transferee (foreign corporation) PPEAN CLINICS SARL   |                               | 4a Identifying number, if any          |
| 5                | Address (including country)   |                               | 4b Reference ID number                 |
| 2 AVE            | ENUE, CHARLES DE GAULLE, LUXEMBOURG   |                               | (see instructions)                     |
| 6                | Country code of country of incorporation or organization (see   | instructions)                 | 5EUROP                                 |
| LU               |   | 5 man dononaj                 |  |
| <b>7</b><br>CORF | Foreign law characterization (see instructions) PORATION  |                               |  |
| 8                | Is the transferee foreign corporation a controlled foreign corp   | ooration?                     | Yes 🗹 No                               |
| For Pa           | aperwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017          |

2017 Report

| Part III Infor  | mation Regarding T   | ransfer of Property                | (see instructions)                              |                               | . 490 =                                      |
|---|--|------------------------------------|---|-------------------------------|--|
|   | sh, Stock, and Secu  |                                    | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                               |  |
| If "Yes," sk  | the only property transfitip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                                   |
| Section B-Prop  | erty qualifying for Acti   | ive Trade or Business              | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                               |  |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |                                    |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                               |  |
| Talala  |  |                                    |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 3,693 3,693 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 3,693 3,693 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |   |
|---|--|---|
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |   |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |   |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |   |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No  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 15c 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) ▶ \$   |   |
| 16  | 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)?   |   |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)   | _ |
| oupp  | remember at the information required to be reported (see instructions)   |   |
|   |  |   |
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|   |  |   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351   |   |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶ _IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.000 %  Type of nonrecognition transaction (see instructions) IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.000 %  Type of nonrecognition transaction (see instructions) IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o  | of transferor  |                               | Identifying number (see instructions)  |
|---------|--|-------------------------------|--|
| THE N   | MCKNIGHT FOUNDATION  |                               | 41-0754835                             |
| 1       | If the transferor was a corporation, complete questions 1a th  |                               |  |
| а       | If the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer.  |                               |  |
|         | or fewer domestic corporations?  |                               |  |
| b       | Did the transferor remain in existence after the transfer? .   |                               | ∐ Yes ∐ No                             |
|         | If not, list the controlling shareholder(s) and their identifying r  | number(s).                    |  |
|         | Controlling shareholder  | Ide                           | entifying number                       |
|         |  |                               |  |
|         |  |                               |  |
|         |  |                               |  |
|         |  |                               |  |
|         |  |                               |  |
|         | If the transferred control of the co |                               | the theory are and                     |
| С       | If the transferor was a member of an affiliated group fil corporation?   | ing a consolidated return     | , was it the parent Yes . No           |
|         | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |
|         | Name of parent corporation   | EIN of                        | parent corporation                     |
|         | Lleve le seis editories este conden e etien 007/eV/f) le ser conde   |                               | □ V □ N-                               |
| d       | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No                               |
| 2       | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367) |
| а       | List the name and EIN of the transferor's partnership.   |                               |  |
|         | Name of partnership  | EIN                           | N of partnership                       |
| COM     | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                               | 20-8306365                             |
| b       | Did the partner pick up its pro rata share of gain on the trans  | fer of partnership assets?    | Yes 🗹 No                               |
| С       | Is the partner disposing of its entire interest in the partnershi  | ip?                           | 🗌 Yes 🗹 No                             |
| d       | Is the partner disposing of an interest in a limited partners  | ship that is regularly trade  | d on an established                    |
|         | securities market?   |                               | 🗌 Yes 🗹 No                             |
| Part    | ,  | ee instructions)              | 1                                      |
| 3       | Name of transferee (foreign corporation)   |                               | 4a Identifying number, if any          |
| 5<br>5  | DPEAN JEWELLERS I S.A.  Address (including country)  |                               | 4b Reference ID number                 |
|         | VENUE DE LA GARE, L-1611, LUXEMBOURG   |                               | (see instructions)                     |
|         |  |                               | 5EURO                                  |
| 6<br>LU | Country code of country of incorporation or organization (see  | e instructions)               |  |
| 7       | Foreign law characterization (see instructions)  |                               |  |
| 8       | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | Yes 🗹 No                               |
| For Pa  | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017          |

2017 Report

| Part III Infor  | mation Regarding T   | ransfer of Property                | (see instructions)                              |                               | . 490 =                                      |
|---|--|------------------------------------|---|-------------------------------|--|
|   | sh, Stock, and Secu  |                                    | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                               |  |
| If "Yes," sk  | the only property transfitip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                                   |
| Section B-Prop  | erty qualifying for Acti   | ive Trade or Business              | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                               |  |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |                                    |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                               |  |
| Talala  |  |                                    |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 61 61 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d)

Form **926** (Rev. 12-2017)

pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |
|----------------------------------|--|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No  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 15c 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) ▶ \$   |
| 16                               | 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)?   |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)   |
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| Спрр                             |  |
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| Part                             |  |
|                                  |  |
|                                  |  |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) > IRS 351  |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) ▶IRS 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRS 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |

(Rev. December 2017) Department of the Treasury

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

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

Attachment

Sequence No. 128

OMB No. 1545-0026

▶ Attach to your income tax return for the year of the transfer or distribution. Internal Revenue Service **U.S. Transferor Information** (see instructions) Name of transferor Identifying number (see instructions) THE MCKNIGHT FOUNDATION 41-0754835 If the transferor was a corporation, complete questions 1a through 1d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 ☐ Yes ☐ No **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 . . . . . . . . . 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)(5) 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 2a through 2d. a List the name and EIN of the transferor's partnership. **EIN** of partnership Name of partnership PANTHEON MULTI-STRATEGY PROGRAM 2014 (US) LP - INVESTOR SERIES 5 47-0754835 **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established ☐ Yes ✓ No Part II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 4a Identifying number, if any FITZPATRICK FINANCIAL GROUP Address (including country) 4b Reference ID number (see instructions) 6FITZ Country code of country of incorporation or organization (see instructions) 6 AS 7 Foreign law characterization (see instructions) **CORPORATION** 

Is the transferee foreign corporation a controlled foreign corporation? .

2017 Report

|   | <u>′ – </u>                       |  | / ' ' ' ' '                               |                               | . 190 =                                |
|---|-----------------------------------|--|---|-------------------------------|--|
|   |                                   | Transfer of Property                                 | (see instructions)                        |                               |  |
| Section A—Cas                                 | sh, Stock, and Secu               |  |   |                               |  |
| Type of property                              | <b>(a)</b><br>Date of<br>transfer | (b) Description of property                          | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer  |
| Cash  | VARIOUS                           |  | 101,792                                   |                               |  |
| Stock and                                     |                                   |  |   |                               |  |
| securities (other                             |                                   |  |   |                               |  |
| than those that                               |                                   |  |   |                               |  |
| qualify as eligible property under            |                                   |  |   |                               |  |
| Regs. sec.                                    |                                   |  |   |                               |  |
| 1.367(a)-2(b)(3))                             |                                   |  |   |                               |  |
| If "Yes," sk  10 Did the training recognition | agreement was filed?              | rt III and go to Part IV. or securities subject to s |   |                               |  |
| Section B—Prop                                |                                   | ive Trade or Business                                |   |                               |  |
| Type of property                              | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b> Description of property                   | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer* |
| Tangible property                             |                                   |  |   |                               |  |
| (not listed under                             |                                   |  |   |                               |  |
| another category)                             |                                   |  |   |                               |  |
| Working interest in                           |                                   |  |   |                               |  |
| oil and gas property                          |                                   |  |   |                               |  |
| (as described in                              |                                   |  |   |                               |  |
| Regs. sec.                                    |                                   |  |   |                               |  |
| 1.367(a)-2(b)(2)                              |                                   |  |   |                               |  |
| and (f))                                      |                                   |  |   |                               |  |
| Financial asset (as                           |                                   |  |   |                               |  |
| described in Regs.                            |                                   |  |   |                               |  |
| sec. 1.367(a)-<br>2(b)(3))                    |                                   |  |   |                               |  |
|   |                                   |  |   |                               |  |
| Certain tangible                              |                                   |  |   |                               |  |
| property to be leased (see Regs.              |                                   |  |   |                               |  |
| sec. 1.367(a)-2(e))                           |                                   |  |   |                               |  |
| Talala  |                                   |  |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

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|---|---|
| ısa   | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |
|   | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   |
| С   | Did the transferor choose to apply the 20-year inclusion period provided under Regulations section  |
|   | 1.367(d)-1(c)(3)(ii) for any intangible property?   |
| d   | If the answer to line 15c 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) ▶ \$  |
| 16  | 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)?  |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)  |
| Оирр  | iomental Falt in information required to be rieported (see mondottons)  |
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|   |   |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  |
| Part<br>17                                      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  |
|   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359_% (b) After0.089359_%  Type of nonrecognition transaction (see instructions) ▶IRC SECTION 351  |
| 17  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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)  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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) |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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) |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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)  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.089359 % (b) After0.089359 %  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)  |

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

OMB No. 1545-0026

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

Attachment Sequence No. 128

**U.S. Transferor Information** (see instructions) Name of transferor Identifying number (see instructions) THE MCKNIGHT FOUNDATION 41-0754835 If the transferor was a corporation, complete questions 1a through 1d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 ☐ Yes ☐ No **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 . . . . . . . . . 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)(5) 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 2a through 2d. a List the name and EIN of the transferor's partnership. **EIN** of partnership Name of partnership PANTHEON GLOBAL SECONDARY FUND V. LP 80-0966179 **b** Did the partner pick up its pro rata share of gain on the transfer of partnership assets? d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established ☐ Yes ✓ No Part II Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) 4a Identifying number, if any **GALILEO GLOBAL EDUCATION** Address (including country) 4b Reference ID number (see instructions) 10009 Country code of country of incorporation or organization (see instructions) Foreign law characterization (see instructions) **CORPORATION** Is the transferee foreign corporation a controlled foreign corporation? . 🗌 Yes 🗹 No Form **926** (Rev. 12-2017)

For Paperwork Reduction Act Notice, see separate instructions.

2017 Report

|   | <u>′</u>                          |  | / ! l l ! \                               |                               | . 190 =                                       |
|---|-----------------------------------|--|---|-------------------------------|---|
|   |                                   | Transfer of Property                                 | (see instructions)                        |                               |   |
| Section A—Cas                                 | sh, Stock, and Secu               |  | 1   |                               |   |
| Type of property                              | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b> Description of property                   | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer               |
| Cash  | VARIOUS                           |  | 588,142                                   |                               |   |
| Stock and                                     |                                   |  |   |                               |   |
| securities (other                             |                                   |  |   |                               |   |
| than those that                               |                                   |  |   |                               |   |
| qualify as eligible property under            |                                   |  |   |                               |   |
| Regs. sec.                                    |                                   |  |   |                               |   |
| 1.367(a)-2(b)(3))                             |                                   |  |   |                               |   |
| If "Yes," sk  10 Did the training recognition | agreement was filed?              | rt III and go to Part IV. or securities subject to s |   |                               | ✓ Yes ☐ No                                    |
| Section B—Prop                                |                                   | tive Trade or Business                               |   |                               |   |
| Type of property                              | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b> Description of property                   | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer* |
| Tangible property                             |                                   |  |   |                               |   |
| (not listed under                             |                                   |  |   |                               |   |
| another category)                             |                                   |  |   |                               |   |
| Working interest in                           |                                   |  |   |                               |   |
| oil and gas property                          |                                   |  |   |                               |   |
| (as described in                              |                                   |  |   |                               |   |
| Regs. sec.                                    |                                   |  |   |                               |   |
| 1.367(a)-2(b)(2)                              |                                   |  |   |                               |   |
| and (f))                                      |                                   |  |   |                               |   |
| Financial asset (as                           |                                   |  |   |                               |   |
| described in Regs.                            |                                   |  |   |                               |   |
| sec. 1.367(a)-<br>2(b)(3))                    |                                   |  |   |                               |   |
|   |                                   |  |   |                               |   |
| Certain tangible                              |                                   |  |   |                               |   |
| property to be leased (see Regs.              |                                   |  |   |                               |   |
| sec. 1.367(a)-2(e))                           |                                   |  |   |                               |   |
|   |                                   |  |   |                               |   |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d)

Form **926** (Rev. 12-2017)

pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                                |  |             |
|------------------------------------|--|-------------|
| ioa                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |             |
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |             |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |             |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |             |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |             |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |             |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |             |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |             |
| b<br>c                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> 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 15c 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) > \$   |             |
| 16                                 | 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)?   |             |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)   | -           |
| очрр                               | iomentari arem imormation ricquirea to be ricportea (see instractions)   | _           |
|                                    |  | _           |
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|                                    |  | _           |
|                                    |  | <u>-</u>    |
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|                                    |  |             |
|                                    |  | _           |
|                                    |  |             |
|                                    |  |             |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |             |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |             |
| Part                               | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %   |             |
| 17<br>18                           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC SECTION 351   |             |
| 17<br>18<br>19                     | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |             |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  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)   |             |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  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) |             |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  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)   |             |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |             |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |             |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |             |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |             |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o         | of transferor   |                               | Identifying number (see instructions) |
|----------------|---|-------------------------------|---------------------------------------|
| THE N          | MCKNIGHT FOUNDATION   |                               | 41-0754835                            |
| 1              | If the transferor was a corporation, complete questions 1a th                                   | rough 1d.                     |                                       |
| а              | If the transfer was a section 361(a) or (b) transfer, was the tr                                |                               |                                       |
|                | or fewer domestic corporations?   |                               |                                       |
| b              | Did the transferor remain in existence after the transfer? .                                    |                               | <b>□ Yes □ No</b>                     |
|                | If not, list the controlling shareholder(s) and their identifying n                             | number(s).                    |                                       |
|                | Controlling shareholder   | lde                           | ntifying number                       |
|                |   |                               |                                       |
|                |   |                               |                                       |
|                |   |                               |                                       |
|                |   |                               |                                       |
|                |   |                               |                                       |
|                |   |                               |                                       |
| С              | If the transferor was a member of an affiliated group filicorporation?                          | ing a consolidated return,    | was it the parent Yes . No            |
|                | If not, list the name and employer identification number (EIN)                                  | of the parent corporation.    |                                       |
|                | Name of parent corporation  | EIN of                        | parent corporation                    |
|                | Llove basis adjustments under section 267/a)/E) been made?                                      |                               | Yes . No                              |
| d              | Have basis adjustments under section 367(a)(5) been made?                                       |                               | Tes   No                              |
| 2              | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. | e actual transferor (but is n | ot treated as such under section 367) |
| a              | List the name and EIN of the transferor's partnership.  |                               |                                       |
|                | Name of partnership   | EIN                           | I of partnership                      |
| COM            | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP   |                               | 20-8306365                            |
| b              | Did the partner pick up its pro rata share of gain on the trans                                 | fer of partnership assets?    | Yes 🗹 No                              |
| С              | Is the partner disposing of its <b>entire</b> interest in the partnershi                        | p?                            | 🗌 Yes 🗹 No                            |
| d              | Is the partner disposing of an interest in a limited partners                                   |                               |                                       |
| B              | securities market?  |                               | Yes 🗹 No                              |
| Part           | •   | e instructions)               |                                       |
| 3<br>HOBE      | Name of transferee (foreign corporation) BYCRAFT GROUP LIMITED                                  |                               | 4a Identifying number, if any         |
| 5              | Address (including country)   |                               | 4b Reference ID number                |
| 7 EN           | TERPRISE WAY AVIATION PARK, BOURNEMOUTH INT<br>N, CHRISTCHURCH, DORSET, BH23 6HG, LUXEMBOUF     |                               | (see instructions)  8HOBB             |
| <b>6</b><br>LU | Country code of country of incorporation or organization (see                                   | e instructions)               |                                       |
| 7              | Foreign law characterization (see instructions)   |                               |                                       |
| 8              | Is the transferee foreign corporation a controlled foreign corp                                 | oration?                      | · · · · · · · · · · · · · · · · · · · |
| For Pa         | aperwork Reduction Act Notice, see separate instructions.                                       | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017         |

2017 Report

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| Part III Infor  | mation Regarding T   | ransfer of Property                | (see instructions)                              |                               | . 490 =                                      |
|---|--|------------------------------------|---|-------------------------------|--|
|   | sh, Stock, and Secu  |                                    | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                               |  |
| If "Yes," sk  | the only property transfitip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                                   |
| Section B-Prop  | erty qualifying for Acti   | ive Trade or Business              | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                               |  |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |                                    |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                               |  |
| Talala  |  |                                    |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 24 24 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes 🔽 No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |  |
|----------------------------------|--|--|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 14a                              | Did the transferor apply section $367(d)$ to a transfer of any property pursuant to Regulations section $1.367(a)-1(b)(5)$ ?   |  |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |  |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |  |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 15a                              | Did the transfer any intangible property that, at the time of the transfer, had a useful life  |  |
| b                                | reasonably anticipated to exceed twenty years?   |  |
| 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 15c 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) > \$   |  |
| 16                               | 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)?   |  |
| <u> </u>                         | less and all Death III before action Described To De Described (see instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
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| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
| Supp                             | emental Part III Information Required To Be Reported (see Instructions)  |  |
|                                  |  |  |
| Part                             |  |  |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| Part<br>17<br>18                 | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) > IRC 351  |  |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |  |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) >RC 351 Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |  |
| Part<br>17<br>18<br>19<br>a<br>b | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| Part 17 18 19 a b c d            | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.000 %  Type of nonrecognition transaction (see instructions) IRC 351 Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |  |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part        | ,  |                               |   |
|-------------|--|-------------------------------|---|
|             | of transferor  |                               | Identifying number (see instructions)   |
|             | MCKNIGHT FOUNDATION  |                               | 41-0754835                              |
| 1           | If the transferor was a corporation, complete questions 1a th  | =                             |   |
| a<br>b      | If the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?  | ransferor controlled (under   | Yes No                                  |
| D           | If not, list the controlling shareholder(s) and their identifying r  |                               | Ies . No                                |
|             | Controlling shareholder  | Ide                           | ntifying number                         |
|             |  |                               |   |
|             |  |                               |   |
|             |  |                               |   |
|             |  |                               |   |
|             |  |                               |   |
|             |  |                               |   |
| С           | If the transferor was a member of an affiliated group fil corporation?   | ing a consolidated return,    | , was it the parent                     |
|             | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |   |
|             | Name of parent corporation   | EIN of                        | parent corporation                      |
|             |  |                               |   |
| d           | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No                                |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367), |
| a           | List the name and EIN of the transferor's partnership.   |                               |   |
|             | Name of partnership  | EIN                           | l of partnership                        |
| PANT        | HEON ACCESS (US), LP - INVESTOR SERIES 6   |                               | 81-4972182                              |
| b           | Did the partner pick up its pro rata share of gain on the trans  |                               | Yes 🗹 No                                |
| C C         | Is the partner disposing of its <b>entire</b> interest in the partnershills the partner disposing of an interest in a limited partners |                               | Yes 🗹 No                                |
| d           | securities market?   |                               |   |
| Part        |  |                               |   |
| 3<br>INFRA  | Name of transferee (foreign corporation) ASTRUCTURE SUPPLY HOLDINGS PTE LTD  |                               | 4a Identifying number, if any           |
| <b>5</b>    | Address (including country) NELOPE CRESCENT, ARNDELL PARK, NSW 2148, AUSTRALIA   |                               | 4b Reference ID number                  |
| 29 F L      | NELOFE GRESCENT, ANNUELE FARR, NOW 2140, AUSTRALIA   |                               | (see instructions)                      |
| <b>6</b> AS | Country code of country of incorporation or organization (see  | e instructions)               | 1001                                    |
| 7           | Foreign law characterization (see instructions)  |                               |   |
| 8           | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | · · · · · · · · · · · · · · · · · · ·   |
| For Pa      | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)          |

|   | <del></del>                                       |                                    |  |                                      | . 49                             |
|---|---|------------------------------------|--|--------------------------------------|----------------------------------|
|   |   | Transfer of Property               | (see instructions)                                     |                                      |                                  |
| ection A—Cas  | h, Stock, and Secu                                | ırities                            |  |                                      |                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer                 | <b>(b)</b> Description of property | <b>(c)</b><br>Fair market value on<br>date of transfer | <b>(d)</b><br>Cost or other<br>basis | (e) Gain recognized on transfer  |
| sh  | 12/12/2017  |                                    | 115,988  |                                      |                                  |
| ock and<br>curities (other<br>an those that<br>alify as eligible<br>operty under    |   |                                    |  |                                      |                                  |
| gs. sec.<br>67(a)-2(b)(3))  |   |                                    |  |                                      |                                  |
| Did the tran recognition  | nsferor transfer stock or<br>agreement was filed? |                                    |  |                                      | 🗌 Yes 🗌 No                       |
| ction B-Prope   | erty qualifying for Ac                            | tive Trade or Business             | exception under Regs                                   | sec. 1.367(a)-2(a)(2)(               | i) and (ii)                      |
| Type of property  | (a)<br>Date of<br>transfer                        | (b) Description of property        | (c) Fair market value on date of transfer              | (d)<br>Cost or other<br>basis        | (e) Gain recognized on transfer* |
| ngible property ot listed under other category)                                     |   |                                    |  |                                      |                                  |
| orking interest in<br>and gas property<br>described in<br>gs. sec.<br>67(a)-2(b)(2) |   |                                    |  |                                      |                                  |
| ancial asset (as<br>scribed in Regs.<br>c. 1.367(a)-<br>)(3))                       |   |                                    |  |                                      |                                  |
| rtain tangible perty to be sed (see Regs. c. 1.367(a)-2(e))                         |   |                                    |  |                                      |                                  |
| 1.1.  |   |                                    |  |                                      |                                  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 13a                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  | ) |
|------------------------------------|--|---|
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  | ) |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   | ) |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  | ) |
| b<br>c                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  | ) |
|                                    | 1.367(d)-1(c)(3)(ii) for any intangible property?  | ) |
| d                                  | If the answer to line 15c 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) ▶ \$   |   |
| 16                                 | 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)?   | ) |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)   |   |
| Сирр                               | remember are in information required to be responsed (see instructions)  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
|                                    |  |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)   |   |
| Part                               | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.386269_%  |   |
| 17<br>18                           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.386269 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  |   |
| 17<br>18<br>19                     | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.386269 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.  |   |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.386269 %  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)  |   |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.386269 %  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) | ) |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.386269 %  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) | ) |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.386269 %  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) | ) |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   | ) |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   | ) |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   | ) |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o    | of transferor  |                               | Identifying number (see instructions)           |
|-----------|--|-------------------------------|---|
| THE N     | MCKNIGHT FOUNDATION  |                               | 41-0754835                                      |
| 1         | If the transferor was a corporation, complete questions 1a th  |                               |   |
| а         | If the transfer was a section 361(a) or (b) transfer, was the transfer was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer was the transfer was the transfer was a section 361(a) or (b) transfer was the tra |                               |   |
|           | or fewer domestic corporations?  |                               |   |
| b         | Did the transferor remain in existence after the transfer? .   |                               | ∐ Yes ∐ No                                      |
|           | If not, list the controlling shareholder(s) and their identifying r  | number(s).                    |   |
|           | Controlling shareholder  | Ide                           | ntifying number                                 |
|           |  |                               |   |
|           |  |                               |   |
|           |  |                               |   |
|           |  |                               |   |
|           |  |                               |   |
|           |  |                               |   |
| С         | If the transferor was a member of an affiliated group fill corporation?  | ing a consolidated return     | , was it the parent<br>□ <b>Yes</b> □ <b>No</b> |
|           | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |   |
|           | Name of parent corporation   | EIN of                        | parent corporation                              |
|           | Library is a sign of instance of a constant of the constant of |                               | □ V □ N-  |
| d         | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes No  |
| 2         | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367           |
| а         | List the name and EIN of the transferor's partnership.   |                               |   |
|           | Name of partnership  | EIN                           | N of partnership                                |
| COM       | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                               | 20-8306365                                      |
| b         | Did the partner pick up its pro rata share of gain on the trans  | fer of partnership assets?    | Yes 🗹 No  |
| С         | Is the partner disposing of its entire interest in the partnershi  | p?                            | 🗌 Yes 🗹 No                                      |
| d         | Is the partner disposing of an interest in a limited partners  | ship that is regularly traded | d on an established                             |
|           | securities market?   |                               | 🗌 Yes 🗹 No                                      |
| Part      | ,  | ee instructions)              | 1   |
| 3<br>INNO | Name of transferee (foreign corporation) VA NOBLE I S.A.R.L.   |                               | 4a Identifying number, if any                   |
| 5         | Address (including country)  |                               | 4b Reference ID number                          |
| 5,RUE     | E GUILLAUME KROLL, L-1882, LUXEMBOURG  |                               | (see instructions)                              |
|           |  |                               | 9INNOVA   |
| 6<br>LU   | Country code of country of incorporation or organization (see  | e instructions)               |   |
| <b>7</b>  | Foreign law characterization (see instructions) PORATION   |                               |   |
| 8         | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | 🗌 Yes 🗹 No                                      |
| For Pa    | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                   |

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2017 Report

| 1 01111 320 (Nev. 12-201  | ,   |                                    |   |                               | rage <b>z</b>                    |
|---|---|------------------------------------|---|-------------------------------|----------------------------------|
|   |   | ransfer of Property                | (see instructions)                        |                               |                                  |
| Type of   | sh, Stock, and Secu<br>(a)<br>Date of   | (b) Description of                 | (c)<br>Fair market value on               | (d)<br>Cost or other          | (e)<br>Gain recognized on        |
| property  | transfer  | property                           | date of transfer                          | basis                         | transfer                         |
| Cash  |   |                                    |   |                               |                                  |
| Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3)) |   |                                    |   |                               |                                  |
| If "Yes," sk  | the only property transf<br>kip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                  | ect to which a gain           | □ Yes ☑ No                       |
| Section B—Prop  | erty qualifying for Act   | ive Trade or Business              | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                      |
| Type of property  | <b>(a)</b><br>Date of<br>transfer   | <b>(b)</b> Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property<br>(not listed under<br>another category)   |   |                                    |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))              |   |                                    |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |   |                                    |   |                               |                                  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))                              |   |                                    |   |                               |                                  |
| Totals  |   |                                    |   |                               |                                  |

\* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 19 19 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 19 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes 🔽 No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |   |
|----------------------------------|--|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No  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 15c 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) ▶ \$   |   |
| 16                               | 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)?   |   |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)   | - |
|                                  |  |   |
| oupp                             | ionian art in information required to be reported (655 metroscione)  | _ |
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|                                  |  |   |
| Part                             |  |   |
|                                  |  |   |
|                                  |  |   |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶RC 351 Indicate whether any transfer reported in Part III is subject to any of the following.  |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.00_ % (b) After0.126926_ %  Type of nonrecognition transaction (see instructions) >RC_351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) \( \bullet \text{RC 351} \) Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |   |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |   |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o                     | of transferor  |                               | Identifying number (see instructions)  |  |
|----------------------------|--|-------------------------------|--|--|
| THE N                      | MCKNIGHT FOUNDATION  |                               | 41-0754835                             |  |
| 1                          | If the transferor was a corporation, complete questions 1a th  |                               |  |  |
| а                          | If the transfer was a section 361(a) or (b) transfer, was the transfer was the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(a) or (b) transfer. |                               |  |  |
|                            | or fewer domestic corporations?  |                               |  |  |
| b                          | Did the transferor remain in existence after the transfer? .   |                               | ∐ Yes ∐ No                             |  |
|                            | If not, list the controlling shareholder(s) and their identifying r  | number(s).                    |  |  |
|                            | Controlling shareholder  | Ide                           | ntifying number                        |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
| С                          | If the transferor was a member of an affiliated group fill corporation?  | ing a consolidated return     | , was it the parent                    |  |
|                            | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |  |
| Name of parent corporation |  | EIN of parent corporation     |  |  |
|                            | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No                               |  |
| d                          | have basis adjustifients under section 507(a)(5) been made?  |                               | Tes   No                               |  |
| 2                          | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367) |  |
| а                          | List the name and EIN of the transferor's partnership.   |                               |  |  |
|                            | Name of partnership  | EIN                           | N of partnership                       |  |
| COM                        | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                               | 20-8306365                             |  |
| b                          | Did the partner pick up its pro rata share of gain on the trans  | fer of partnership assets?    | Yes 🗹 No                               |  |
| С                          | Is the partner disposing of its entire interest in the partnershi  | ip?                           | 🗌 Yes 🗹 No                             |  |
| d                          | Is the partner disposing of an interest in a limited partners  | ship that is regularly traded | d on an established                    |  |
|                            | securities market?   |                               | 🗌 Yes 🗹 No                             |  |
| Part                       |  | ee instructions)              | 1                                      |  |
| 3<br>INNO                  | Name of transferee (foreign corporation) VA PHEONIX SARL   |                               | 4a Identifying number, if any          |  |
| 5                          | Address (including country)  |                               | 4b Reference ID number                 |  |
| 5,RUE                      | E GUILLAUME KROLL,, L-1882, LUXEMBOURG   |                               | (see instructions)                     |  |
|                            |  |                               | 9INNO                                  |  |
| 6<br>LU                    | Country code of country of incorporation or organization (see  | e instructions)               |  |  |
| 7<br>CORF                  | Foreign law characterization (see instructions) PORATION   |                               |  |  |
| 8                          | Is the transferee foreign corporation a controlled foreign corp  | oration?                      | · · · · · · · · · · · · · · · · · · ·  |  |
| For Pa                     | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017          |  |

2017 Report

| Part III Infor  | mation Regarding T   | ransfer of Property                | (see instructions)                              |                               | . 490 =                                      |
|---|--|------------------------------------|---|-------------------------------|--|
|   | sh, Stock, and Secu  |                                    | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                               |  |
| If "Yes," sk  | the only property transfitip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                                   |
| Section B-Prop  | erty qualifying for Acti   | ive Trade or Business              | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                               |  |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |                                    |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                               |  |
| Talala  |  |                                    |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 6,455 6,455 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 6,455 6,455 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a   |  |
|---|--|
|   | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |
|   | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No   |
| С   | Did the transferor choose to apply the 20-year inclusion period provided under Regulations section   |
|   | 1.367(d)-1(c)(3)(ii) for any intangible property?  |
| d   | If the answer to line 15c 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) ▶ \$   |
| 16  | Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?   |
| Supp  | lemental Part III Information Required To Be Reported (see instructions)   |
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|   |  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)   |
| Part  |  |
| Part<br>17                                      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926_% (b) After0.126926_%   |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) >IRC SECTION 351   |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)   |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.126926 % (b) After0.126926 %  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)   |

# 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. Sequence No. 128

Attachment

OMB No. 1545-0026

| Name of           | transferor (See Instructions)   |                             | Identifying number (see instructions)               |
|-------------------|---|-----------------------------|---|
| THE M             | CKNIGHT FOUNDATION  |                             | 41-0754835  |
|                   | If the transferor was a corporation, complete questions 1a the lift the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?  | ransferor controlled (under | Yes . No  |
|                   | Controlling shareholder   | Ide                         | ntifying number                                     |
|                   |   |                             |   |
|                   |   |                             |   |
|                   |   |                             |   |
|                   |   |                             |   |
| С                 | If the transferor was a member of an affiliated group fill corporation?   | •                           | was it the parent                                   |
|                   | If not, list the name and employer identification number (EIN)  | of the parent corporation.  |   |
|                   | Name of parent corporation  | EIN of                      | parent corporation                                  |
| d                 | Have basis adjustments under section 367(a)(5) been made?   |                             | Yes No  |
| 2                 | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   |                             |   |
| а                 | List the name and EIN of the transferor's partnership.  |                             |   |
|                   | Name of partnership   | EIN                         | l of partnership                                    |
| СОММ              | ONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                             | 20-8306365  |
| С                 | Did the partner pick up its pro rata share of gain on the trans is the partner disposing of its <b>entire</b> interest in the partnershi is the partner disposing of an interest in a limited partners securities market? | p?                          | $\square$ Yes $\checkmark$ No                       |
| Part              |   |                             |   |
| 3<br>INNOV        | Name of transferee (foreign corporation) 'A PRIME S.A.R.L   |                             | 4a Identifying number, if any                       |
| <b>5</b><br>5,RUE | Address (including country) GUILLAUME KROLL, L-1882, L-1882, LUXEMBOURG   |                             | 4b Reference ID number (see instructions) 9INNOVA P |
| <b>6</b><br>LU    | Country code of country of incorporation or organization (see   | instructions)               |   |
| 7                 | Foreign law characterization (see instructions) ORATION   |                             |   |
| 8                 | Is the transferee foreign corporation a controlled foreign corp   | oration?                    | Yes 🗹 No  |
| or Pa             | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D             | Form <b>926</b> (Rev. 12-20                         |

2017 Report

| 1 01111 320 (Nev. 12-201  | ,   |                                    |   |                               | rage <b>z</b>                    |
|---|---|------------------------------------|---|-------------------------------|----------------------------------|
|   |   | ransfer of Property                | (see instructions)                        |                               |                                  |
| Type of   | sh, Stock, and Secu<br>(a)<br>Date of   | (b) Description of                 | (c)<br>Fair market value on               | (d)<br>Cost or other          | (e)<br>Gain recognized on        |
| property  | transfer  | property                           | date of transfer                          | basis                         | transfer                         |
| Cash  |   |                                    |   |                               |                                  |
| Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3)) |   |                                    |   |                               |                                  |
| If "Yes," sk  | the only property transficip the remainder of Par<br>nsferor transfer stock on agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                  | ect to which a gain           | □ Yes ☑ No                       |
| Section B—Prop  | erty qualifying for Act   | ive Trade or Business              | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                      |
| Type of property  | <b>(a)</b><br>Date of<br>transfer   | <b>(b)</b> Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property<br>(not listed under<br>another category)   |   |                                    |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))              |   |                                    |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |   |                                    |   |                               |                                  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))                              |   |                                    |   |                               |                                  |
| Totals  |   |                                    |   |                               |                                  |

\* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 18 18 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 18 18 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes 🔽 No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |
|----------------------------------|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No  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 15c 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) ▶ \$  |
| 16                               | 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)?  |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)  |
|                                  | iomentari art in information required to be rieported (500 motivolions)   |
|                                  |   |
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|                                  |   |
| Part                             | Additional Information Regarding Transfer of Property (see instructions)  |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| Part 17                          | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351   |
| Part<br>17<br>18<br>19           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a b                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a b c              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| 17<br>18<br>19<br>a<br>b<br>c    | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| Part 17 18 19 a b c d 20         | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part  17  18  19  a b c d 20 21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Part I U.S. Transferor Information (see instructions)   |   |
|---|---|
| Name of transferor  | Identifying number (see instructions)                               |
| THE MCKNIGHT FOUNDATION  1 If the transferor was a corporation, complete questions 1a th  | 41-0754835  |
| <b>a</b> If the transfer was a section 361(a) or (b) transfer, was the t or fewer domestic corporations?  | ransferor controlled (under section 368(c)) by 5                    |
| Controlling shareholder   | Identifying number  |
|   |   |
|   |   |
|   |   |
|   |   |
| c If the transferor was a member of an affiliated group fil corporation?  | ing a consolidated return, was it the parent                        |
| If not, list the name and employer identification number (EIN)  | of the parent corporation.  |
| Name of parent corporation  | EIN of parent corporation   |
| d Have basis adjustments under section 367(a)(5) been made?   |   |
| <ul><li>2 If the transferor was a partner in a partnership that was the complete questions 2a through 2d.</li><li>a List the name and EIN of the transferor's partnership.</li></ul>  | e actual transferor (but is not treated as such under section 367), |
| Name of partnership   | EIN of partnership  |
| COMMONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  | 20-8306365  |
| <ul> <li>b Did the partner pick up its pro rata share of gain on the trans</li> <li>c Is the partner disposing of its entire interest in the partnersh</li> <li>d Is the partner disposing of an interest in a limited partners securities market?</li> </ul> | ip?   |
| Part II Transferee Foreign Corporation Information (se  | ee instructions)  |
| 3 Name of transferee (foreign corporation) INNOVA SUPREME I S.AR.L.   | 4a Identifying number, if any                                       |
| 5 Address (including country)<br>5,RUE GUILLAUME KROLL, L-1882, LUXEMBOURG  | 4b Reference ID number (see instructions)                           |
| 6 Country code of country of incorporation or organization (see   |   |
| 7 Foreign law characterization (see instructions) CORPORATION   |   |
| 8 Is the transferee foreign corporation a controlled foreign corporation.  For Paperwork Reduction Act Notice, see separate instructions.   | oration?  |

For Paperwork Reduction Act Notice, see separate instructions.

2017 Report

| Part III Inform  | nation Regarding       | Transfer of Property        | (see instructions)                        |                               |  |
|--|------------------------|-----------------------------|---|-------------------------------|--|
|  | h, Stock, and Secu     |                             | (   |                               |  |
| Type of property   | (a) Date of transfer   | (b) Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b> Gain recognized on transfer |
| ısh  |                        |                             |   |                               |  |
| ock and curities (other an those that lalify as eligible operty under egs. sec. 367(a)-2(b)(3))  |                        |                             |   |                               |  |
| If "Yes," ski  Did the tran  |                        | rt III and go to Part IV.   | section 367(a) with respe                 | ct to which a gain            | □ Yes ☑ N                              |
| ection B-Prope   | erty qualifying for Ac | tive Trade or Business      | exception under Regs.                     | sec. 1.367(a)-2(a)(2)         | (i) and (ii)                           |
| Type of property   | (a) Date of transfer   | (b) Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*       |
| ngible property of listed under other category)  | adioloi                | property                    | date of admore                            | 5400                          | danoioi                                |
| orking interest in<br>and gas property<br>a described in<br>gs. sec.<br>867(a)-2(b)(2)<br>d (f)) |                        |                             |   |                               |  |
| nancial asset (as<br>scribed in Regs.<br>c. 1.367(a)-<br>b)(3))                                  |                        |                             |   |                               |  |
| rtain tangible pperty to be sed (see Regs. c. 1.367(a)-2(e))                                     |                        |                             |   |                               |  |
| otals  |                        |                             |   |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 18 18 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 18 18 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes 🔽 No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

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|---|--|
| ısa   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |
|   | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  |
| С   | Did the transferor choose to apply the 20-year inclusion period provided under Regulations section   |
|   | 1.367(d)-1(c)(3)(ii) for any intangible property?  |
| d   | If the answer to line 15c 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) ▶ \$   |
| 16  | 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)?   |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)   |
| Сирр  | The state of the s |
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| Part  | V Additional Information Regarding Transfer of Property (see instructions)   |
| Part  | V Additional Information Regarding Transfer of Property (see instructions)   |
| Part<br>17                                      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.126926_%  |
|   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) ▶IRC 351  |
| 17  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) >IRC 351 Indicate whether any transfer reported in Part III is subject to any of the following.   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶ IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶ IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) ▶ IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.126926_%  Type of nonrecognition transaction (see instructions) ▶ IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.126926 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before   |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part       | ,   |                               |  |
|------------|---|-------------------------------|--|
|            | f transferor  |                               | Identifying number (see instructions)            |
| THE M      | ICKNIGHT FOUNDATION  If the transferor was a corporation, complete questions 1a the   | rough 1d                      | 41-0754835                                       |
| a<br>b     | If the transfer of was a corporation, complete questions faithful the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?  Did the transferor remain in existence after the transfer?  If not, list the controlling shareholder(s) and their identifying n | ansferor controlled (under    | section 368(c)) by 5 Yes                         |
|            |   |                               |  |
|            | Controlling shareholder   | lde                           | ntifying number                                  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
|            |   |                               |  |
| С          | If the transferor was a member of an affiliated group fili corporation?   | ng a consolidated return,     | was it the parent                                |
|            | If not, list the name and employer identification number (EIN)  | of the parent corporation.    |  |
|            | Name of parent corporation  | EIN of                        | parent corporation                               |
|            |   |                               | paroni oci poranon                               |
|            |   |                               |  |
| d          | Have basis adjustments under section 367(a)(5) been made?   |                               | Yes 🗌 No   |
| 2          | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is r | not treated as such under section 367),          |
| a          | List the name and EIN of the transferor's partnership.  |                               |  |
|            | Name of partnership   | EIN                           | I of partnership                                 |
| PANTH      | HEON MULTI-STRATEGY PROGRAM 2014 (US) LP - INVESTOR SERIES 5  |                               | 47-0754835                                       |
| b          | Did the partner pick up its pro rata share of gain on the transf  |                               |  |
| d<br>C     | Is the partner disposing of its <b>entire</b> interest in the partnerships the partner disposing of an interest in a limited partners   | •                             | Yes 🗹 No   |
|            | securities market?  |                               | Yes 🗹 No   |
| Part       | <b>5</b> 1  | e instructions)               | 4. Identifying prompton if one                   |
| 3<br>INTAS | Name of transferee (foreign corporation)  PHARMACEUTICALS LIMITED   |                               | <b>4a Identifying number</b> , if any 98-1278764 |
|            | Address (including country)<br>FLOOR, CHINUBHAI CENTRE, OFF. NEHRU BRIDGE, A<br>EDABAD , INDIA  | SHRAM ROAD,                   | 4b Reference ID number (see instructions)        |
| 6<br>IN    | Country code of country of incorporation or organization (see   | instructions)                 |  |
| 7          | Foreign law characterization (see instructions) ORATION   |                               |  |
| 8          | Is the transferee foreign corporation a controlled foreign corp   | oration?                      | · · · · · · · · · · · · Yes 🗹 No                 |
| For Pa     | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |

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2017 Report

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|--|---|--|--|--------------------------------------|---|
|  |   | ransfer of Property                                | (see instructions)                                     |                                      |   |
| Section A—Cas  | sh, Stock, and Secu   | rities   |  |                                      |   |
| Type of property   | <b>(a)</b><br>Date of<br>transfer   | <b>(b)</b> Description of property                 | (c) Fair market value on date of transfer              | <b>(d)</b><br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer  |
| Cash   | 3/27/2017   |  | 101,885  |                                      |   |
| Stock and  |   |  |  |                                      |   |
| securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |   |  |  |                                      |   |
|  |   |  |  |                                      |   |
| If "Yes," sk   | the only property transfitip the remainder of Partinsferor transfer stock on agreement was filed? | t III and go to Part IV. r securities subject to s | ection 367(a) with respe                               | ct to which a gain                   | ☑ Yes ☑ No                                    |
| Section B-Prop   | erty qualifying for Act   | ive Trade or Business                              | exception under Regs                                   | . sec. 1.367(a)-2(a)(2)(i            | ) and (ii)                                    |
| Type of property   | <b>(a)</b><br>Date of<br>transfer   | (b) Description of property                        | <b>(c)</b><br>Fair market value on<br>date of transfer | <b>(d)</b><br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer* |
| Tangible property (not listed under another category)  |   |  |  |                                      |   |
| Working interest in oil and gas property   |   |  |  |                                      |   |
| (as described in   |   |  |  |                                      |   |
| Regs. sec.<br>1.367(a)-2(b)(2)   |   |  |  |                                      |   |
| and (f))   |   |  |  |                                      |   |
|  |   |  |  |                                      |   |
| Financial asset (as described in Regs.   |   |  |  |                                      |   |
| sec. 1.367(a)-<br>2(b)(3))   |   |  |  |                                      |   |
|  |   |  |  |                                      |   |
| Certain tangible   |   |  |  |                                      |   |
| property to be leased (see Regs.   |   |  |  |                                      |   |
| sec. 1.367(a)-2(e))  |   |  |  |                                      |   |
|  |   |  |  |                                      |   |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

| 13a   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |  |
|---|---|--|
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |  |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |  |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No 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 15c 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) > \$  |  |
| 16  | 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)?  |  |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)  |  |
| oupp  | ichichtar i art in information ricquirea to be ricported (acc matraotiona)  |  |
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| Part  | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part  | V Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part<br>17                                      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.00316_%  |  |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.00316 %  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)  |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.00316_%  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)  |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.00316_%  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)  |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.00316_%  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)  |  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.00316 %  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) |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o      | of transferor   |                               | Identifying number (see instructions)             |
|-------------|---|-------------------------------|---|
| THE N       | MCKNIGHT FOUNDATION   |                               | 41-0754835  |
| 1           | If the transferor was a corporation, complete questions 1a the  | rough 1d.                     |   |
| а           | If the transfer was a section 361(a) or (b) transfer, was the tr  | ansferor controlled (under    | section 368(c)) by 5                              |
|             | or fewer domestic corporations?   |                               |   |
| b           | Did the transferor remain in existence after the transfer? .  |                               | Yes . No  |
|             | If not, list the controlling shareholder(s) and their identifying n   | number(s).                    |   |
|             | Controlling shareholder   | lde                           | ntifying number                                   |
|             |   |                               |   |
|             |   |                               |   |
|             |   |                               |   |
|             |   |                               |   |
|             |   |                               |   |
|             |   |                               |   |
| С           | If the transferor was a member of an affiliated group fili corporation?   | ng a consolidated return      | , was it the parent<br>□ <b>Yes</b> □ <b>No</b>   |
|             | 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)(5) been made?   |                               | Yes . No  |
| d           | have basis adjustments under section 567(a)(5) been made?   |                               | Tes   No  |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.                                 | e actual transferor (but is r | not treated as such under section 367)            |
| а           | List the name and EIN of the transferor's partnership.  |                               |   |
|             | Name of partnership   | EIN                           | l of partnership                                  |
| COM         | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP   |                               | 20-8306365  |
| b           | Did the partner pick up its pro rata share of gain on the trans   | fer of partnership assets?    | Yes 🗹 No  |
| С           | Is the partner disposing of its entire interest in the partnershi   | p?                            | 🗌 Yes 🗹 No  |
| d           | Is the partner disposing of an interest in a limited partners   | hip that is regularly traded  | d on an established                               |
|             | securities market?  |                               | 🗌 Yes 🗹 No  |
| Part        |   | ee instructions)              |   |
| 3           | Name of transferee (foreign corporation)  |                               | 4a Identifying number, if any                     |
|             | L TOPCO LIMITED   |                               | 44.5.4  |
|             | Address (including country) LAKESIDE NORTH HARBOUR, SUITE 310 THIRD FLOOD N E BEN, UNITED KINGDOM (ENGLAND, NORTHERN IRELAND, S |                               | 4b Reference ID number (see instructions)  13MAPI |
| <b>6</b> UK | Country code of country of incorporation or organization (see   | e instructions)               | I DIVINI I  |
| 7           | Foreign law characterization (see instructions)   |                               |   |
| 8           | Is the transferee foreign corporation a controlled foreign corp   | oration?                      | Yes 🗹 No  |
| For Pa      | aperwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                     |

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2017 Report

| Part III Infor  | mation Regarding T   | ransfer of Property                      | (see instructions)                              |                               |  |
|---|--|--|---|-------------------------------|--|
|   | sh, Stock, and Secu  |  | (0.00)  |                               |  |
| Type of property  | (a)<br>Date of<br>transfer   | <b>(b)</b><br>Description of<br>property | (c)<br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | <b>(e)</b> Gain recognized on transfer |
| Cash  |  |  |   |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) | VARIOUS  |  | 0   | 884                           |  |
| If "Yes," sk  | the only property transfing the remainder of Par<br>nsferor transfer stock on agreement was filed? | t III and go to Part IV.                 | ection 367(a) with respe                        | ect to which a gain           | □ Yes ☑ No                             |
| Section B-Prop  | erty qualifying for Act  | ive Trade or Business                    | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(      | i) and (ii)                            |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property       | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*       |
| Tangible property<br>(not listed under<br>another category)   |  |  |   |                               |  |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |  |   |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |  |   |                               |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |  |   |                               |  |
| T. 11.  |  |  |   |                               | <u> </u>                               |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 268 268 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 268 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d)

Form **926** (Rev. 12-2017)

pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                                | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |
|------------------------------------|---|
| b                                  | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 14a                                | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |
| b                                  | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| С                                  | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |
|                                    | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |
| d                                  | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$  |
| 15a                                | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |
| b<br>c                             | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No  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 15c 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) ▶ \$  |
| 16                                 | 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)?  |
| Sunn                               | lemental Part III Information Required To Be Reported (see instructions)  |
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|                                    |   |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  |
| Part                               | Additional Information Regarding Transfer of Property (see instructions)  |
| Part<br>17                         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
|                                    | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) ▶IRC SECTION 351 AND SECTION 368(A)(1)(E)   |
| 17                                 | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| 17<br>18<br>19<br>a                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.000 %  Type of nonrecognition transaction (see instructions) ▶IRC SECTION 351 AND SECTION 368(A)(1)(E)  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)   |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) ▶ _IRC SECTION 351 AND SECTION 368(A)(1)(E)  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.000_%  Type of nonrecognition transaction (see instructions) ▶ _IRC SECTION 351 AND SECTION 368(A)(1)(E)  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| 17<br>18<br>19<br>a<br>b           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| 17<br>18<br>19<br>a<br>b<br>c      | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.000 %  Type of nonrecognition transaction (see instructions) IRC SECTION 351 AND SECTION 368(A)(1)(E)  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3)  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o            | of transferor  |                               | Identifying number (see instructions)      |
|-------------------|--|-------------------------------|--|
| THE N             | MCKNIGHT FOUNDATION  |                               | 41-0754835                                 |
| 1                 | If the transferor was a corporation, complete questions 1a th  |                               |  |
| а                 | If the transfer was a section 361(a) or (b) transfer, was the transfer was a section 361(b) transfer.  |                               |  |
|                   | or fewer domestic corporations?  |                               |  |
| b                 | Did the transferor remain in existence after the transfer? .   |                               | <b>□ Yes □ No</b>                          |
|                   | If not, list the controlling shareholder(s) and their identifying r  | number(s).                    |  |
|                   | Controlling shareholder  | Ide                           | entifying number                           |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   | If the transfer of the feet of |                               | th the mount                               |
| С                 | If the transferor was a member of an affiliated group fil corporation?   | ing a consolidated return     | , was it the parent <b>Yes</b> . <b>No</b> |
|                   | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |
|                   | Name of parent corporation   | EIN of                        | parent corporation                         |
|                   | Llove basis adjustments under section 267(s)/E) been made?   |                               | Yes No                                     |
| d                 | Have basis adjustments under section 367(a)(5) been made?  |                               | Tes   No                                   |
| 2                 | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367)     |
| a                 | List the name and EIN of the transferor's partnership.   |                               |  |
|                   | Name of partnership  | EIN                           | N of partnership                           |
| COM               | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                               | 20-8306365                                 |
| b                 | Did the partner pick up its pro rata share of gain on the trans  | fer of partnership assets?    | <b>Yes</b> 🗹 No                            |
| С                 | Is the partner disposing of its entire interest in the partnershi  | ip?                           | 🗌 Yes 🗹 No                                 |
| d                 | Is the partner disposing of an interest in a limited partners  | ship that is regularly trade  | d on an established                        |
|                   | securities market?   |                               | 🗌 Yes 🗹 No                                 |
| Part              | ,  | ee instructions)              | 1  |
| 3                 | Name of transferee (foreign corporation)   |                               | 4a Identifying number, if any              |
|                   | DIC CAPITAL VII ALPHA, L.P.  |                               | 98-0568124                                 |
| <b>5</b><br>26 ES | Address (including country) SPLANADE, ST HELIER, JE2 3QA, JERSEY   |                               | 4b Reference ID number (see instructions)  |
| 6<br>JE           | Country code of country of incorporation or organization (see  | e instructions)               | 1  |
| 7                 | Foreign law characterization (see instructions) ED PARTNERSHIP   |                               |  |
| 8                 | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | 🗌 Yes 🗹 No                                 |
| For Pa            | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017              |

2017 Report

| 1 01111 920 (Nev. 12-201  | <u>'</u>   |                                    |   |                                      | rage <b>Z</b>                                |
|---|--|------------------------------------|---|--------------------------------------|--|
|   | mation Regarding T   |                                    | (see instructions)                              |                                      |  |
| Section A—Cas   | sh, Stock, and Secui   | rities                             |   |                                      |  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer  | <b>(b)</b> Description of property | (c)<br>Fair market value on<br>date of transfer | <b>(d)</b><br>Cost or other<br>basis | <b>(e)</b><br>Gain recognized on<br>transfer |
| Cash  |  |                                    |   |                                      |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |                                    |   |                                      |  |
| If "Yes," sk  | the only property transficip the remainder of Par<br>nsferor transfer stock of<br>agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                        | ect to which a gain                  | .  Yes  No                                   |
| Section B-Prop  | erty qualifying for Acti   | ve Trade or Business               | exception under Regs                            | . sec. 1.367(a)-2(a)(2)(i            | ) and (ii)                                   |
| Type of property  | (a) Date of transfer   | <b>(b)</b> Description of property | (c) Fair market value on date of transfer       | (d)<br>Cost or other<br>basis        | (e) Gain recognized on transfer*             |
| Tangible property<br>(not listed under<br>another category)   |  |                                    |   |                                      |  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |  |                                    |   |                                      |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |                                    |   |                                      |  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |                                    |   |                                      |  |
|   |  |                                    |   |                                      |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (a) Date of (c) Fair market value on Type of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) **VARIOUS EQUITY INTEREST** 40,871 Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 40,871 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes 🔽 No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d)

Form **926** (Rev. 12-2017)

pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |
|----------------------------------|--|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> 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 15c 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) ▶ \$   |
| 16                               | 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)?   |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)   |
| JUNN                             | ichichtair air in information ricquirea ro be ricportea (occimotractiono)  |
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|                                  |  |
| Part                             | V Additional Information Regarding Transfer of Property (see instructions)   |
|                                  | V Additional Information Regarding Transfer of Property (see instructions)   |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %   |
| Part 17                          | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276_% (b) After0.043276_%  Type of nonrecognition transaction (see instructions) ▶IRC 351   |
| Part<br>17<br>18<br>19           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) >IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a b                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a b c              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276_% (b) After0.043276_%  Type of nonrecognition transaction (see instructions) ▶IRC 351_ Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| 17<br>18<br>19<br>a<br>b<br>c    | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a b c d 20         | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part  17  18  19  a b c d 20 21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.043276 % (b) After0.043276 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part               | ( )  |                               |  |
|--------------------|--|-------------------------------|--|
|                    | f transferor   |                               | Identifying number (see instructions)            |
|                    | MCKNIGHT FOUNDATION  | rough 1d                      | 41-0754835                                       |
| 1<br>a             | If the transferor was a corporation, complete questions 1a the If the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations? | ransferor controlled (under   | section 368(c)) by 5                             |
| b                  | Did the transferor remain in existence after the transfer? . If not, list the controlling shareholder(s) and their identifying r                             | number(s).                    | Yes . No   |
|                    | Controlling shareholder  | Ide                           | ntifying number                                  |
|                    |  |                               |  |
|                    |  |                               |  |
|                    |  |                               |  |
|                    |  |                               |  |
|                    |  |                               |  |
|                    |  |                               |  |
| С                  | If the transferor was a member of an affiliated group fill corporation?  | ing a consolidated return,    | , was it the parent                              |
|                    | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |
|                    | Name of parent corporation   | EIN of                        | parent corporation                               |
|                    |  |                               |  |
| d                  | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes   No   |
| 2<br>a             | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. List the name and EIN of the transferor's partnership.       | e actual transferor (but is r | not treated as such under section 367),          |
|                    | Name of partnership  | EIN                           | l of partnership                                 |
| COMM               | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                               | 20-8306365                                       |
| b<br>c             | Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its <b>entire</b> interest in the partnershi                     | p?                            | Yes 🗹 No<br>Yes 🗹 No                             |
| d                  | Is the partner disposing of an interest in a limited partners securities market?   |                               | d on an established<br>□ <b>Yes ☑ No</b>         |
| Part               | · · · · · · · · · · · · · · · · · · ·  | ee instructions)              |  |
| ONE N              | Name of transferee (foreign corporation) NORDIC HOLDING AB   |                               | 4a Identifying number, if any                    |
| <b>5</b><br>P.O. B | Address (including country)<br>SOX 50529, MALMO, 20250, SWEDEN   |                               | <b>4b</b> Reference ID number (see instructions) |
| 6                  | Country code of country of incorporation or organization (see  | e instructions)               | 15ONEN   |
| <b>7</b>           | Foreign law characterization (see instructions)  |                               |  |
| <b>8</b>           | ORATION  Is the transferee foreign corporation a controlled foreign corp   | ooration?                     | Yes 🗸 No   |
|                    | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |

Cat. No. 16982D

| Part III Infor  | mation Pagarding                                  | Transfer of Property                                  | (see instructions)                        |                                      |                                  |
|---|---|---|---|--------------------------------------|----------------------------------|
|   | h, Stock, and Secu                                |   | (See Instructions)                        |                                      |                                  |
| Type of property  | (a) Date of transfer                              | (b) Description of property                           | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis        | (e) Gain recognized on transfer  |
| ısh   |   |   |   |                                      |                                  |
| ock and<br>curities (other<br>an those that<br>alify as eligible<br>operty under<br>gs. sec.<br>367(a)-2(b)(3)) |   |   |   |                                      |                                  |
| (-) (-)(-)  |   |   |   |                                      |                                  |
| If "Yes," sk  Did the tran recognition  | nsferor transfer stock or<br>agreement was filed? | rt III and go to Part IV.  or securities subject to s | section 367(a) with respe                 |                                      | □ Yes ☑ No                       |
| ection B—Prope  |   | _   | exception under Regs                      |                                      |                                  |
| Type of property  | <b>(a)</b><br>Date of<br>transfer                 | <b>(b)</b> Description of property                    | (c) Fair market value on date of transfer | <b>(d)</b><br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| angible property<br>ot listed under<br>nother category)   |   |   |   |                                      |                                  |
| orking interest in<br>and gas property<br>s described in<br>egs. sec.<br>367(a)-2(b)(2)<br>d (f))               |   |   |   |                                      |                                  |
| nancial asset (as escribed in Regs. c. 1.367(a)-  |   |   |   |                                      |                                  |
| ertain tangible operty to be ased (see Regs. c. 1.367(a)-2(e))  |   |   |   |                                      |                                  |
|   |   |   |   |                                      |                                  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

Page 3

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory **VARIOUS LOAN NOTES** 0 12,919 Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 12,919 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B)

Form **926** (Rev. 12-2017)

Property subject to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a   | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |  |
|---|--|--|
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?  |  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied  |  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?   |  |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$   |  |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?  |  |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> 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 15c 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) ▶ \$   |  |
| 16  | 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)?   |  |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)   |  |
| Jupp  | ichichtair art in information ricquirea ro be ricportea (occ motractions)  |  |
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| Part  | V Additional Information Regarding Transfer of Property (see instructions)   |  |
| Part  | <u> </u>   |  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %   |  |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385_% (b) After0.027077_%  Type of nonrecognition transaction (see instructions) ▶IRC 351   |  |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.025385 % (b) After0.027077 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

|             | of transferor  |                               | Identifying number (see instructions)     |
|-------------|--|-------------------------------|---|
|             | MCKNIGHT FOUNDATION  | 1.4.1                         | 41-0754835                                |
| 1<br>a<br>b | If the transferor was a corporation, complete questions 1a the lift the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?   | ransferor controlled (under   | Yes 🗌 No                                  |
|             | Controlling shareholder  | Ide                           | ntifying number                           |
|             | •  |                               |   |
|             |  |                               |   |
| С           | If the transferor was a member of an affiliated group fil 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)(5) been made?  |                               | Yes . No                                  |
| 2<br>a      | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  List the name and EIN of the transferor's partnership.  | e actual transferor (but is r | not treated as such under section 367     |
|             | Name of partnership  | EIN                           | N of partnership                          |
| VINTA       | AGE IV, LP   |                               | 20-8254632                                |
| b<br>c<br>d | Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its <b>entire</b> interest in the partnerships the partner disposing of an interest in a limited partners securities market? | ip?                           |   |
| Part        | Transferee Foreign Corporation Information (se   |                               |   |
| 3<br>OUTD   | Name of transferee (foreign corporation) DOOR LIVING GROUP B.V.  |                               | 4a Identifying number, if any             |
| 5           | Address (including country)<br>TAV MAHL-ERPLEIN 106 ITO-TOREN 22HG, AMSTERD/   | AMN, NETHERLANDS              | 4b Reference ID number (see instructions) |
| 6<br>NP     | Country code of country of incorporation or organization (see  | e instructions)               |   |
| 7           | Foreign law characterization (see instructions)  |                               |   |
| 8           | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | 🗌 Yes 🗹 No                                |
| For Pa      | aperwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-201              |

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2017 Report

| 1 01111 320 (Nev. 12-201  | ,   |                                    |   |                               | rage <b>z</b>                    |
|---|---|------------------------------------|---|-------------------------------|----------------------------------|
|   |   | ransfer of Property                | (see instructions)                        |                               |                                  |
| Type of   | sh, Stock, and Secu<br>(a)<br>Date of   | (b) Description of                 | (c)<br>Fair market value on               | (d)<br>Cost or other          | (e)<br>Gain recognized on        |
| property  | transfer  | property                           | date of transfer                          | basis                         | transfer                         |
| Cash  |   |                                    |   |                               |                                  |
| Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3)) |   |                                    |   |                               |                                  |
| If "Yes," sk  | the only property transficip the remainder of Par<br>nsferor transfer stock on agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                  | ect to which a gain           | □ Yes ☑ No                       |
| Section B—Prop  | erty qualifying for Act   | ive Trade or Business              | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                      |
| Type of property  | <b>(a)</b><br>Date of<br>transfer   | <b>(b)</b> Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property<br>(not listed under<br>another category)   |   |                                    |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))              |   |                                    |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |   |                                    |   |                               |                                  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))                              |   |                                    |   |                               |                                  |
| Totals  |   |                                    |   |                               |                                  |

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)6/15/2017 ORD SHARES A1, B2 & CUM PREE SHARES 2,588 2,588 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 2,588 2,588 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |   |
|----------------------------------|---|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\Box$ Yes $\Box$ No 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 15c 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) > \$  |   |
| 16                               | 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)?  |   |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)  |   |
| JUPP                             | ichichtair ait in miormation ricquirea ro be ricportea (500 motractions)  |   |
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|                                  |   |   |
| Part                             | Additional Information Regarding Transfer of Property (see instructions)  |   |
|                                  | V Additional Information Regarding Transfer of Property (see instructions)  |   |
|                                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before 0.000 % (b) After 0.048896 %   |   |
| Part 17                          | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.048896 %  Type of nonrecognition transaction (see instructions) ▶IRC SECTION 351   |   |
| Part<br>17<br>18<br>19           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.048896 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |   |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.048896 %  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) |   |
| Part 17 18 19 a b                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.048896_%  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) |   |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.048896_%  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) |   |
| Part 17 18 19 a b c              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.048896_%  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) |   |
| 17<br>18<br>19<br>a<br>b<br>c    | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| Part 17 18 19 a b c d 20         | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.048896 %  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) |   |
| Part  17  18  19  a b c d 20 21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  | - |

Form **926** (Rev. 12-2017)

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part<br>Name o             | U.S. Transferor Information (see instructions) of transferor   |                               | Identifying number (see instructions)                    |  |
|----------------------------|--|-------------------------------|--|--|
|                            | MCKNIGHT FOUNDATION  | 41-0754835                    |  |  |
| 1                          | If the transferor was a corporation, complete questions 1a th  | rough 1d.                     | 1 3 3 3 3 3 3  |  |
| a<br>b                     | If the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?  | ransferor controlled (under   | Yes . No   |  |
|                            |  | 1                             |  |  |
|                            | Controlling shareholder  | Ide                           | ntifying number  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            |  |                               |  |  |
|                            | If the transfer was a second of the fell that a second of  |                               |  |  |
| С                          | If the transferor was a member of an affiliated group fil 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)(5) been made?  |                               | Yes . No   |  |
| 2                          | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is r | not treated as such under section 367)                   |  |
| a                          | The state of the s |                               | EIN of partnership                                       |  |
|                            | Name of partnership  | EIN                           | of partnership   |  |
| COM                        | MONFUND CAPITAL INTERNATIONAL PARTNERS VI, LP  |                               | 20-8306365   |  |
| b                          | Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its <b>entire</b> interest in the partnership  | ip?                           | Yes 🗹 No   |  |
| d                          | Is the partner disposing of an interest in a limited partners securities market?   | ship that is regularly traded | d on an established Yes  V No                            |  |
| Part                       | Transferee Foreign Corporation Information (se   | ee instructions)              |  |  |
| 3<br>PEP L                 | Name of transferee (foreign corporation)  LUXEMBOURG SCSP  |                               | 4a Identifying number, if any                            |  |
| <b>5</b><br>5 RUE          | Address (including country) E GUILLAUME KROLL, L-1882, LUXEMBOURG  |                               | <b>4b</b> Reference ID number (see instructions)  16PEPL |  |
| 6<br>LU                    | Country code of country of incorporation or organization (see  | e instructions)               | 1  |  |
| 7                          | Foreign law characterization (see instructions)  |                               |  |  |
| 8                          | Is the transferee foreign corporation a controlled foreign corp  | ooration?                     | 🗌 Yes 🗹 No   |  |
| For Pa                     | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                            |  |

| Part III Infor  | mation Regarding 1                | Transfer of Property (                                  | (see instructions)                                     |                               | . 490 =                                |
|---|-----------------------------------|---|--|-------------------------------|--|
|   | sh, Stock, and Secu               |   | (00000000000000000000000000000000000000                |                               |  |
| Type of property  | (a)<br>Date of<br>transfer        | (b) Description of property                             | <b>(c)</b><br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer  |
| Cash  |                                   |   |  |                               |  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) | VARIOUS                           | STOCK AND SECURITIES                                    | 36,277   | 36,277                        |  |
| If "Yes," sk  10 Did the trained recognition  | agreement was filed?              | rt III and go to Part IV.<br>r securities subject to se |  |                               | □ Yes ☑ No                             |
| Section B-Prop  | erty qualifying for Act           | ive Trade or Business                                   | exception under Regs                                   | s. sec. 1.367(a)-2(a)(2)(i    | ) and (ii)                             |
| Type of property  | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b> Description of property                      | <b>(c)</b><br>Fair market value on<br>date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer* |
| Tangible property<br>(not listed under<br>another category)   |                                   |   |  |                               |  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |                                   |   |  |                               |  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |                                   |   |  |                               |  |
| Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))   |                                   |   |  |                               |  |
| Talala  |                                   |   |  |                               |  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

## Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS** NONFUNCTIONAL CURRENCY 1,274 1,274 Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 1,274 1,274 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject

Form **926** (Rev. 12-2017)

to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

| 13a   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |  |
|---|---|--|
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |  |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |  |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |  |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |  |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |  |
| b<br>c  | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> 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 15c 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) > \$  |  |
| 16  | 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)?  |  |
| Sunn  | lemental Part III Information Required To Be Reported (see instructions)  |  |
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| Part  | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part  | Additional Information Regarding Transfer of Property (see instructions)  |  |
| Part<br>17                                      | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  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) |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |

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

OMB No. 1545-0026

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

Attachment Sequence No. 128

| Part               | ,   |                               | Identifies number (oc- !tt')                              |
|--------------------|---|-------------------------------|---|
|                    | f transferor<br>//CKNIGHT FOUNDATION  |                               | Identifying number (see instructions) 41-0754835          |
| 1                  | If the transferor was a corporation, complete questions 1a th   | rough 1d.                     | 1 71 07 04 0 0 0  |
| a                  | If the transfer was a section 361(a) or (b) transfer, was the tror fewer domestic corporations?   | ransferor controlled (under   |   |
| b                  | Did the transferor remain in existence after the transfer? . If not, list the controlling shareholder(s) and their identifying n            | umber(s).                     | Yes . No  |
|                    | Controlling shareholder   | Ide                           | ntifying number   |
|                    |   |                               |   |
|                    |   |                               |   |
|                    |   |                               |   |
|                    |   |                               |   |
|                    |   |                               |   |
| С                  | If the transferor was a member of an affiliated group fill corporation?   | ng a consolidated return,     | was it the parent   |
|                    | If not, list the name and employer identification number (EIN)  | of the parent corporation.    |   |
|                    | Name of parent corporation  | EIN of                        | parent corporation  |
|                    |   |                               |   |
| d                  | Have basis adjustments under section 367(a)(5) been made?   |                               | Yes . No  |
| 2                  | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is n | not treated as such under section 367),                   |
| а                  | List the name and EIN of the transferor's partnership.  |                               |   |
|                    | Name of partnership   | EIN                           | l of partnership  |
| COMN               | MONFUND CAPITAL PRIVATE EQUITY PARTNERS VI, LP  |                               | 16-1720029  |
| b<br>c             | Did the partner pick up its pro rata share of gain on the trans<br>Is the partner disposing of its <b>entire</b> interest in the partnershi |                               | Yes ☑ No<br>Yes ☑ No                                      |
| d                  | Is the partner disposing of an interest in a limited partners securities market?  | ,                             | d on an established                                       |
| Part               |   |                               |   |
| 3<br>QMC           | Name of transferee (foreign corporation) DAS MEXICO S.A.P.I. DE C.V.  |                               | 4a Identifying number, if any                             |
| 5<br>AV. F<br>MEXI | Address (including country) HOMERO 418, POLANCO, POLANCO V SECC, CIUDADD  | EMEXICO, CP11560,             | <b>4b</b> Reference ID number (see instructions)  17QMC D |
| <b>6</b>           | Country code of country of incorporation or organization (see   | e instructions)               | T QIVIO D   |
| 7                  | Foreign law characterization (see instructions)   |                               |   |
| 8                  | Is the transferee foreign corporation a controlled foreign corp   | oration?                      | 🗸 Yes 🗌 No  |
| For Pa             | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                            |

2017 Report

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o           | of transferor   |                               | Identifying number (see instructions) |  |  |  |
|------------------|---|-------------------------------|---------------------------------------|--|--|--|
| THE N            | MCKNIGHT FOUNDATION   |                               | 41-0754835                            |  |  |  |
| 1                | If the transferor was a corporation, complete questions 1a th                                   |                               |                                       |  |  |  |
| а                |   |                               |                                       |  |  |  |
|                  | or fewer domestic corporations?   |                               |                                       |  |  |  |
| b                |   | ⊔ Yes ⊔ No                    |                                       |  |  |  |
|                  | If not, list the controlling shareholder(s) and their identifying r                             | number(s).                    |                                       |  |  |  |
|                  | Controlling shareholder   | Ide                           | ntifying number                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
|                  |   |                               |                                       |  |  |  |
| С                | If the transferor was a member of an affiliated group fil corporation?                          | •                             | , was it the parent                   |  |  |  |
|                  | If not, list the name and employer identification number (EIN)                                  | of the parent corporation.    |                                       |  |  |  |
|                  | Name of parent corporation  | EIN of                        | parent corporation                    |  |  |  |
|                  |   |                               |                                       |  |  |  |
| d                | Have basis adjustments under section 367(a)(5) been made?                                       |                               | Yes No                                |  |  |  |
| 2                | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. | e actual transferor (but is r | not treated as such under section 367 |  |  |  |
| a                | List the name and EIN of the transferor's partnership.  |                               |                                       |  |  |  |
|                  | Name of partnership   | EIN                           | N of partnership                      |  |  |  |
| COM              | MONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP   |                               | 20-8306306                            |  |  |  |
| b                | Did the partner pick up its pro rata share of gain on the trans                                 | fer of partnership assets?    | Yes 🗸 No                              |  |  |  |
| С                | Is the partner disposing of its entire interest in the partnershi                               | ip?                           | 🗌 Yes 🗹 No                            |  |  |  |
| d                | Is the partner disposing of an interest in a limited partners                                   | ship that is regularly trade  | d on an established                   |  |  |  |
|                  | securities market?  |                               | 🗌 Yes 🗹 No                            |  |  |  |
| Part             | •   | ee instructions)              | T                                     |  |  |  |
| 3<br>QMC         | Name of transferee (foreign corporation) DAS MEXICO S.A.P.I. DE C.V.                            |                               | 4a Identifying number, if any         |  |  |  |
| 5                | Address (including country)   |                               | 4b Reference ID number                |  |  |  |
|                  | HOMERO 418, POLANCO, POLANCO V SECC, CIUDADE  | DEMEXICO, CP11560,            | (see instructions)                    |  |  |  |
| MEX              |   |                               | 17QMC D                               |  |  |  |
| 6<br>MX          | Country code of country of incorporation or organization (see                                   | e instructions)               |                                       |  |  |  |
| <b>7</b><br>CORF | Foreign law characterization (see instructions) PORATION  |                               |                                       |  |  |  |
| 8                | Is the transferee foreign corporation a controlled foreign corp                                 | ooration?                     | 🗹 Yes 🗌 No                            |  |  |  |
| For Pa           | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017         |  |  |  |

2017 Report

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part              | ,  |                               |  |
|-------------------|--|-------------------------------|--|
|                   | f transferor   |                               | Identifying number (see instructions)            |
|                   | ICKNIGHT FOUNDATION  | 1.4.1                         | 41-0754835                                       |
| 1<br>a<br>b       | If the transferor was a corporation, complete questions 1a the lift the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations? | ransferor controlled (under   |  |
|                   | Controlling shareholder  | lde                           | ntifying number                                  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
|                   |  |                               |  |
| С                 | If the transferor was a member of an affiliated group filicorporation?   | ing a consolidated return,    | was it the parent                                |
|                   | If not, list the name and employer identification number (EIN)   | of the parent corporation.    |  |
|                   | Name of parent corporation   | EIN of                        | parent corporation                               |
|                   |  |                               |  |
| d                 | Have basis adjustments under section 367(a)(5) been made?  |                               | Yes . No   |
| 2                 | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.  | e actual transferor (but is n | not treated as such under section 367),          |
| a                 | List the name and EIN of the transferor's partnership.   |                               |  |
|                   | Name of partnership  | EIN                           | l of partnership                                 |
| COMM              | MONFUND CAPITAL PRIVATE EQUITY PARTNERS IX, LP   |                               | 36-4778201                                       |
| b                 | Did the partner pick up its pro rata share of gain on the trans-   |                               | Yes 🗹 No   |
| С                 | Is the partner disposing of its <b>entire</b> interest in the partnershi   | -                             | □ Yes 🗹 No                                       |
| d                 | Is the partner disposing of an interest in a limited partners securities market?   | = =                           | d on an established Yes 🗹 No                     |
| Part              |  | ee instructions)              |  |
| 3                 | Name of transferee (foreign corporation)   | ,                             | 4a Identifying number, if any                    |
| QMC [             | DAS MEXICO S.A.P.I. DE C.V.  |                               |  |
| <b>5</b><br>AV. ⊢ | Address (including country) HOMERO 418, POLANCO, POLANCO V SECC, CIUDADD   | EMEXICO, CP11560,             | <b>4b</b> Reference ID number (see instructions) |
| MEXI              |  |                               | 17QMC D  |
| 6<br>MX           | Country code of country of incorporation or organization (see  | e instructions)               |  |
| <b>7</b><br>CORP  | Foreign law characterization (see instructions)  |                               |  |
| 8                 | Is the transferee foreign corporation a controlled foreign corp  | oration?                      | · · · · · · · · · · · · · · · · · · ·            |
| For Pa            | perwork Reduction Act Notice, see separate instructions.   | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017)                   |

2017 Report

| 1 01111 320 (Nev. 12-201  | ,   |                                    |   |                               | raye <b>z</b>                    |
|---|---|------------------------------------|---|-------------------------------|----------------------------------|
|   |   | ransfer of Property                | (see instructions)                        |                               |                                  |
| Type of   | sh, Stock, and Secu<br>(a)<br>Date of   | (b) Description of                 | (c)<br>Fair market value on               | (d)<br>Cost or other          | (e)<br>Gain recognized on        |
| property  | transfer  | property                           | date of transfer                          | basis                         | transfer                         |
| Cash  |   |                                    |   |                               |                                  |
| Stock and securities (other than those that qualify as eligible property under Regs. sec. 1.367(a)-2(b)(3)) |   |                                    |   |                               |                                  |
| If "Yes," sk  | the only property transficip the remainder of Par<br>nsferor transfer stock on agreement was filed? | t III and go to Part IV.           | ection 367(a) with respe                  | ect to which a gain           | □ Yes ☑ No                       |
| Section B-Prop  | erty qualifying for Act   | ive Trade or Business              | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                      |
| Type of property  | <b>(a)</b><br>Date of<br>transfer   | <b>(b)</b> Description of property | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property<br>(not listed under<br>another category)   |   |                                    |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))              |   |                                    |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |   |                                    |   |                               |                                  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))                              |   |                                    |   |                               |                                  |
| Totals  |   |                                    |   |                               |                                  |

\* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)**VARIOUS MEXICAN PESO** 430 430 Nonfunctional **VARIOUS MEXICAN PESO** 954 954 currency, etc. (as described in Regs. 7 7 **VARIOUS MEXICAN PESO** sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) 1,391 1,391 Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. ☐ Yes ✓ No 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . ☐ Yes 🔽 No Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B)

Form **926** (Rev. 12-2017)

Property subject to sec. 367(d) pursuant to Regs. sec. 1.367(a)-1(b)(5)

**Totals** 

| 13a                              | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |  |
|----------------------------------|---|--|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section $1.367(a)-1(b)(5)$ ?  |  |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |  |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |  |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |  |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$  |  |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |  |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ <b>Yes</b> $\square$ <b>No</b> 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 15c 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) ▶ \$  |  |
| 16                               | 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)?  |  |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)  |  |
| JUPP                             | ichichtair ait in miormation ricquirea ro be ricportea (300 motractions)  |  |
|                                  | i i i i i   |  |
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|                                  |   |  |
|                                  |   |  |
|                                  |   |  |
| Part                             | V Additional Information Regarding Transfer of Property (see instructions)  |  |
|                                  | V Additional Information Regarding Transfer of Property (see instructions)  |  |
|                                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part<br>17<br>18<br>19           | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before Various % (b) After Various %  Type of nonrecognition transaction (see instructions) ▶ IRC 367 AND 351  Indicate whether any transfer reported in Part III is subject to any of the following. |  |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part 17 18 19 a b                | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part 17 18 19 a                  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part 17 18 19 a b c              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| 17<br>18<br>19<br>a<br>b<br>c    | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part 17 18 19 a b c d 20         | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |
| Part  17  18  19  a b c d 20 21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |  |

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

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

Attachment Sequence No. 128

OMB No. 1545-0026

| Part           | ,   |                               | Identifies number ( in-to- 1)                       |
|----------------|---|-------------------------------|---|
|                | f transferor  |                               | Identifying number (see instructions)               |
| 1HE N          | MCKNIGHT FOUNDATION  If the transferor was a corporation, complete questions 1a th  | rough 1d                      | 41-0754835  |
| a<br>b         | If the transfer was a section 361(a) or (b) transfer, was the tror fewer domestic corporations?   | ransferor controlled (under   |   |
|                |   | T                             |   |
|                | Controlling shareholder   | Ide                           | ntifying number                                     |
|                |   |                               |   |
|                |   |                               |   |
|                |   |                               |   |
|                |   |                               |   |
| С              | If the transferor was a member of an affiliated group fill corporation?   | ing a consolidated return,    | was it the parent                                   |
|                | If not, list the name and employer identification number (EIN)  | of the parent corporation.    |   |
|                | Name of parent corporation  | EIN of                        | parent corporation                                  |
|                | Have basis adjustments under section 367(a)(5) been made?   |                               | Yes . No  |
| d              | riave basis adjustifients under section 307(a)(3) been made:  |                               | <u>. res _ no</u>                                   |
| 2              | If the transferor was a partner in a partnership that was the complete questions 2a through 2d.   | e actual transferor (but is r | not treated as such under section 367)              |
| a              | List the name and EIN of the transferor's partnership.  |                               |   |
|                | Name of partnership   | EIN                           | l of partnership                                    |
| ORBIN          | MED ASIA PARTNERS III, L.P.   |                               | 98-1325964  |
| b<br>c<br>d    | Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its <b>entire</b> interest in the partnershills the partner disposing of an interest in a limited partners securities market? | p?                            |   |
| Part           |   |                               | L Yes ✓ No  |
| 3              | Name of transferee (foreign corporation) JAN BIOKIN PHARMACEUTICAL CO., LTD   | ,                             | 4a Identifying number, if any                       |
| <b>5</b> NO. 1 | Address (including country)<br>, BUILDING 1, NO. 161 BAILI ROAD, CHENGDU HAIXIA LIAN<br>STRY PARK, CHENGDU, WENIJANG DISTRICT, WENJIANG I   |                               | 4b Reference ID number (see instructions) SICHUAN02 |
| <b>6</b> CH    | Country code of country of incorporation or organization (see   | e instructions)               |   |
| 7<br>CORP      | Foreign law characterization (see instructions)   |                               |   |
| 8              | Is the transferee foreign corporation a controlled foreign corp   | oration?                      | 🗌 Yes 🗹 No  |
| For Pa         | perwork Reduction Act Notice, see separate instructions.  | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                       |

| Part III Infor  | mation Regarding T                | ransfer of Property                                | (see instructions)                        |                               |                                  |
|---|-----------------------------------|--|---|-------------------------------|----------------------------------|
|   | sh, Stock, and Secu               |  | (occ mendenens)                           |                               |                                  |
| Type of property  | (a) Date of transfer              | <b>(b)</b> Description of property                 | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer  |
| Cash  | 9/13/2017                         |  | 346,881                                   |                               |                                  |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |                                   |  |   |                               |                                  |
| If "Yes," sk  10 Did the trained recognition  | agreement was filed?              | t III and go to Part IV. r securities subject to s | ection 367(a) with respe                  |                               | ✓ Yes ☐ No                       |
| Section B-Prop  | erty qualifying for Act           | ive Trade or Business                              | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                      |
| Type of property  | <b>(a)</b><br>Date of<br>transfer | <b>(b)</b> Description of property                 | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer* |
| Tangible property<br>(not listed under<br>another category)   |                                   |  |   |                               |                                  |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |                                   |  |   |                               |                                  |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |                                   |  |   |                               |                                  |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |                                   |  |   |                               |                                  |
| Totals  |                                   |  |   |                               |                                  |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

**Totals** 

| 13a                              | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |
|----------------------------------|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$  |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No 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 15c 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) ▶ \$  |
| 16                               | 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)?  |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)  |
|                                  |   |
| Сирр                             | ionian and management required to be reported (ede mediaciens)  |
| очрр                             |   |
| Сирр                             |   |
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|                                  |   |
|                                  |   |
|                                  |   |
| Part                             |   |
|                                  |   |
|                                  |   |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.0856_%  Type of nonrecognition transaction (see instructions) \bigsim IRC 351  |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.0856 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.00_ % (b) After   |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o          | of transferor   |                               | Identifying number (see instructions)            |  |  |  |
|-----------------|---|-------------------------------|--|--|--|--|
| THE N           | MCKNIGHT FOUNDATION   |                               | 41-0754835                                       |  |  |  |
| 1               | If the transferor was a corporation, complete questions 1a th                                   |                               |  |  |  |  |
| а               |   |                               |  |  |  |  |
|                 | or fewer domestic corporations?   |                               |  |  |  |  |
| b               |   |                               |  |  |  |  |
|                 | If not, list the controlling shareholder(s) and their identifying r                             | number(s).                    |  |  |  |  |
|                 | Controlling shareholder   | Ide                           | ntifying number                                  |  |  |  |
|                 |   |                               |  |  |  |  |
|                 |   |                               |  |  |  |  |
|                 |   |                               |  |  |  |  |
|                 |   |                               |  |  |  |  |
|                 |   |                               |  |  |  |  |
|                 |   |                               |  |  |  |  |
| С               | If the transferor was a member of an affiliated group fil corporation?                          | ing a consolidated return     | , was it the parent                              |  |  |  |
|                 | If not, list the name and employer identification number (EIN)                                  | of the parent corporation.    |  |  |  |  |
|                 | Name of parent corporation  | EIN of parent corporation     |  |  |  |  |
|                 | Have basis adjustments under section 367(a)(5) been made?                                       |                               | Yes . No   |  |  |  |
| d               | nave basis adjustifients under section 307 (a)(3) been made?                                    |                               | Tes   No   |  |  |  |
| 2               | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. | e actual transferor (but is r | not treated as such under section 367            |  |  |  |
| a               | List the name and EIN of the transferor's partnership.  |                               |  |  |  |  |
|                 | Name of partnership   | EIN                           | l of partnership                                 |  |  |  |
| TPG /           | ART FIP AIV III, L.P.   |                               | 98-1188789                                       |  |  |  |
| b               | Did the partner pick up its pro rata share of gain on the trans                                 | fer of partnership assets?    | Yes 🗸 No   |  |  |  |
| С               | Is the partner disposing of its <b>entire</b> interest in the partnershi                        |                               | Yes 🗹 No   |  |  |  |
| d               | Is the partner disposing of an interest in a limited partners                                   | ship that is regularly traded | d on an established                              |  |  |  |
|                 | securities market?  |                               | 🗌 Yes 🗹 No                                       |  |  |  |
| Part            | ,   | ee instructions)              |  |  |  |  |
| 3               | Name of transferee (foreign corporation)  |                               | 4a Identifying number, if any                    |  |  |  |
|                 | NFTEC, S.A.   |                               | Ala Defeuera a ID murahan                        |  |  |  |
| <b>5</b><br>RUA | Address (including country)<br>ABRAAO VINHAS, 242 CONCORDIA II, BRAZIL                          |                               | <b>4b</b> Reference ID number (see instructions) |  |  |  |
|                 |   |                               | 19SOLI   |  |  |  |
| <b>6</b><br>BR  | Country code of country of incorporation or organization (see                                   | e instructions)               |  |  |  |  |
| 7               | Foreign law characterization (see instructions)   |                               |  |  |  |  |
| 8               | Is the transferee foreign corporation a controlled foreign corp                                 | oration?                      | · · · · · · · · · · Yes 🗹 No                     |  |  |  |
| For Pa          | aperwork Reduction Act Notice, see separate instructions.                                       | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017                    |  |  |  |

2017 Report

| Part III Infor  | mation Regarding   | Transfer of Property                                   | (see instructions)                        |                               |                                       |
|---|--|--|---|-------------------------------|---------------------------------------|
|   | sh, Stock, and Secu  |  | (0.00.000000000000000000000000000000000   |                               |                                       |
| Type of property  | (a)<br>Date of<br>transfer   | (b) Description of property                            | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer |
| Cash  | VARIOUS  |  | 120,288                                   |                               |                                       |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |  |  |   |                               |                                       |
| If "Yes," sk  | the only property transfit the remainder of Parties of Parties of Parties of the remainder of Parties of Parties of Parties of the Parties of P | rt III and go to Part IV.<br>r securities subject to s | ection 367(a) with respe                  | ct to which a gain            |                                       |
| Section B-Prop  | erty qualifying for Act  | ive Trade or Business                                  | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                           |
| Type of property  | (a) Date of transfer   | (b) Description of property                            | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*      |
| Tangible property<br>(not listed under<br>another category)   |  |  |   |                               |                                       |
| Working interest in<br>oil and gas property<br>(as described in<br>Regs. sec.<br>1.367(a)-2(b)(2)<br>and (f))                 |  |  |   |                               |                                       |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |  |  |   |                               |                                       |
| Certain tangible<br>property to be<br>leased (see Regs.<br>sec. 1.367(a)-2(e))  |  |  |   |                               |                                       |
| T. 11.  |  |  |   |                               |                                       |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

**Totals** 

| 13a   |   |
|---|---|
|   | Did the transferor transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?   |
| b   | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| 14a   | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |
| b   | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |
| С   | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |
|   | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |
| d   | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ▶ \$  |
| 15a   | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |
| b   | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? $\square$ Yes $\square$ No  |
| С   | Did the transferor choose to apply the 20-year inclusion period provided under Regulations section  |
|   | 1.367(d)-1(c)(3)(ii) for any intangible property?   |
| d   | If the answer to line 15c 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) ▶ \$  |
| 16  | Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  |
| Supp  | lemental Part III Information Required To Be Reported (see instructions)  |
| Сирр  | ionional Fait III Internation (10 danoa 10 da 110 danoa (10 da 110 d  |
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|   |   |
|   |   |
| Part  | IV Additional Information Regarding Transfer of Property (see instructions)   |
| Part  |   |
| Part  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736_% (b) After1.4736_%  |
|   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  Type of nonrecognition transaction (see instructions) >IRC SECTION 351  |
| 17  | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  Type of nonrecognition transaction (see instructions) ► IRC SECTION 351  Indicate whether any transfer reported in Part III is subject to any of the following.   |
| 17<br>18<br>19<br>a                             | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  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) |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  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) |
| 17<br>18<br>19<br>a<br>b                        | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  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) |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  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) |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| 17<br>18<br>19<br>a<br>b<br>c                   | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |
| 17<br>18<br>19<br>a<br>b<br>c<br>d<br>20<br>21a | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before1.4736 % (b) After1.4736 %  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) |
| 17<br>18<br>19<br>a<br>b<br>c<br>d              | Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |

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

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

OMB No. 1545-0026

Attachment

Sequence No. 128

| Name o      | of transferor   |                               | Identifying number (see instructions) |  |  |  |
|-------------|---|-------------------------------|---------------------------------------|--|--|--|
| THE N       | MCKNIGHT FOUNDATION   |                               | 41-0754835                            |  |  |  |
| 1           | If the transferor was a corporation, complete questions 1a th                                   |                               |                                       |  |  |  |
| а           | (1)   |                               |                                       |  |  |  |
|             | or fewer domestic corporations?   |                               |                                       |  |  |  |
| b           |   | <b>∐ Yes ∐ No</b>             |                                       |  |  |  |
|             | If not, list the controlling shareholder(s) and their identifying r                             | number(s).                    |                                       |  |  |  |
|             | Controlling shareholder   | Ide                           | entifying number                      |  |  |  |
|             |   |                               |                                       |  |  |  |
|             |   |                               |                                       |  |  |  |
|             |   |                               |                                       |  |  |  |
|             |   |                               |                                       |  |  |  |
|             |   |                               |                                       |  |  |  |
|             |   |                               |                                       |  |  |  |
| С           | If the transferor was a member of an affiliated group fill corporation?                         | ing a consolidated return     | , was it the parent<br>□ 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)(5) been made?                                       |                               | Yes . No                              |  |  |  |
| 2           | If the transferor was a partner in a partnership that was the complete questions 2a through 2d. | e actual transferor (but is i | not treated as such under section 367 |  |  |  |
| a           | List the name and EIN of the transferor's partnership.  |                               |                                       |  |  |  |
|             | Name of partnership   | EII                           | N of partnership                      |  |  |  |
| ORBII       | MED ASIA PARTNERS III, L.P.   |                               | 98-1325964                            |  |  |  |
| b           | Did the partner pick up its pro rata share of gain on the trans                                 | fer of partnership assets?    | Yes 🗹 No                              |  |  |  |
| С           | Is the partner disposing of its entire interest in the partnershi                               | ip?                           | 🗌 Yes 🗹 No                            |  |  |  |
| d           | Is the partner disposing of an interest in a limited partners                                   | ship that is regularly trade  | d on an established                   |  |  |  |
|             | securities market?  |                               | 🗌 Yes 🗹 No                            |  |  |  |
| Part        | •   | ee instructions)              | 1                                     |  |  |  |
| 3<br>VIVIM  | Name of transferee (foreign corporation) IED LABS (MASCARENE) LIMITED                           |                               | 4a Identifying number, if any         |  |  |  |
| 5           | Address (including country)   |                               | 4b Reference ID number                |  |  |  |
|             | ST ISLAND COMPANY LIMITED, SUITE 308, ST. JAMES (<br>EET, PORT LOUIS, MAURITIUS                 | COURT, ST. DENIS              | (see instructions) VIVIMED01          |  |  |  |
| <b>6</b> MP | Country code of country of incorporation or organization (see                                   | e instructions)               |                                       |  |  |  |
| 7<br>CORF   | Foreign law characterization (see instructions) PORATION  |                               |                                       |  |  |  |
| 8           | Is the transferee foreign corporation a controlled foreign corp                                 | oration?                      | 🗌 Yes 🗹 No                            |  |  |  |
| For Pa      | aperwork Reduction Act Notice, see separate instructions.                                       | Cat. No. 16982D               | Form <b>926</b> (Rev. 12-2017         |  |  |  |

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2017 Report

| Part III Infor  | mation Regarding  | Transfer of Property                                    | (see instructions)                        |                               |                                       |
|---|---|---|---|-------------------------------|---------------------------------------|
|   | sh, Stock, and Secu   |   | (0.00.000000000000000000000000000000000   |                               |                                       |
| Type of property  | (a)<br>Date of<br>transfer  | (b) Description of property                             | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e)<br>Gain recognized on<br>transfer |
| Cash  | VARIOUS   |   | 453,721                                   |                               |                                       |
| Stock and<br>securities (other<br>than those that<br>qualify as eligible<br>property under<br>Regs. sec.<br>1.367(a)-2(b)(3)) |   |   |   |                               |                                       |
| If "Yes," sk  | the only property transitip the remainder of Par<br>nsferor transfer stock on<br>agreement was filed? | rt III and go to Part IV.<br>or securities subject to s | ection 367(a) with respe                  | ect to which a gain           |                                       |
| Section B-Prop  | erty qualifying for Act   | ive Trade or Business                                   | exception under Regs                      | . sec. 1.367(a)-2(a)(2)(i     | i) and (ii)                           |
| Type of property  | (a) Date of transfer  | (b) Description of property                             | (c) Fair market value on date of transfer | (d)<br>Cost or other<br>basis | (e) Gain recognized on transfer*      |
| Tangible property<br>(not listed under<br>another category)   |   |   |   |                               |                                       |
| Working interest in oil and gas property (as described in Regs. sec. 1.367(a)-2(b)(2) and (f))                                |   |   |   |                               |                                       |
| Financial asset (as described in Regs. sec. 1.367(a)-2(b)(3))   |   |   |   |                               |                                       |
| Certain tangible property to be leased (see Regs. sec. 1.367(a)-2(e))   |   |   |   |                               |                                       |
| Talala  |   |   |   |                               |                                       |

<sup>\*</sup> If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions.

### Form 926 (Rev. 12-2017) Section C-Property not qualifying for Active Trade or Business exception (other than intangible property subject to section 367(d)) (b) Description of (d) Cost or other (c) Fair market value on Type of Date of Gain recognized on property transfer property date of transfer basis transfer\* Inventory Installment obligations, etc. (as described in Regs. sec. 1.367(a)-2(c)(2)Nonfunctional currency, etc. (as described in Regs. sec. 1.367(a)-2(c)(3)Certain leased tangible property (as described in Regs. sec. 1.367(a)-2(c)(4)) Certain property to be retransferred (see Regs. sec. 1.367(a)-2(g)) Property described in Regs. sec. 1.6038B-1(c)(4)(iv) Property described in Regs. sec. 1.6038B-1(c)(4)(vii) Totals \* If property listed in this section is subject to depreciation recapture or branch loss recapture, see instructions. 11 Did the transferor transfer assets that qualify for the trade or business exception under section 367(a)(3)? ☐ Yes ☐ No 12 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-2 through 1.367(a)-7 for any of the following. Transfer of property subject to section 367(a)(1) gain recognition. Depreciation recapture . . . . . . . . . . . . . . Yes Branch loss recapture (see instructions) . . . . . . . . . d If the answer to 12c is "Yes," enter the amount of foreign branch loss recapture ▶ \$ If the answer to line 12a, 12b, 12c, or 12e is "Yes," see instructions for information that must be included in the Supplemental Part III Information Required To Be Reported section below. Section D-Intangible property under Regs. sec. 1.367(a)-1(d)(5) (f) (b) Description of (c) Useful Type of (e) Cost or other basis Income inclusion Arm's length price on date of transfer Date of property for year of transfer transfer property life (see instructions) Property described in sec. 936(h)(3)(B) Property subject to sec. 367(d) pursuant to Regs.

Form **926** (Rev. 12-2017)

sec. 1.367(a)-1(b)(5)

**Totals** 

| 13a                              | Did the transfer property described in section 936(h)(3)(B) (not including section 1221(a)(3) property or a working interest in oil and gas property)?  |   |
|----------------------------------|---|---|
| b                                | If the answer to line 13a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| 14a                              | Did the transferor apply section 367(d) to a transfer of any property pursuant to Regulations section 1.367(a)-1(b)(5)?   |   |
| b                                | If the answer to line 14a is "Yes," enter the total amount included in income under section 367 (d), if any, for the transfer of all such property on the income tax return for the year of the transfer ▶ \$   |   |
| С                                | If the answer to line 14a is "No," did the transferor transfer any property for which it could have applied   |   |
|                                  | section 367(d) pursuant to Regulations section 1.367(a)-1(b)(5) but did not?  |   |
| d                                | If the answer to line 14c is "Yes," enter the total amount of gain recognized, if any, under section 367(a)(1) on the transfer of all such property on the income tax return for the year of the transfer ► \$  |   |
| 15a                              | Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed twenty years?   |   |
| b<br>c                           | At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?   Yes  No  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 15c 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) ▶ \$  |   |
| 16                               | 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)?  |   |
| Sunn                             | lemental Part III Information Required To Be Reported (see instructions)  | _ |
|                                  |   |   |
| oupp                             | ichichtai i art in imorniation ricquirea to be ricportea (300 matiactions)  |   |
| Бирр                             | remental Fart III Information required To be reported (See Instructions)  |   |
| Бирр                             | iemental Fart III Information Required To be Reported (See Instructions)  |   |
| Бирр                             | iomental Fart in information required To be reported (See instructions)   |   |
| Supp                             | iomental Fait in information required To be reported (See instructions)   |   |
|                                  | incinental Fair III IIII of Tiequired To Be rieported (See III structions)  |   |
|                                  | iomental Fait in information required To be reported (See instructions)   |   |
|                                  | is incital if are in information required to be reported (see instructions)   |   |
| <u> </u>                         | Remental Fait in information required to be rieported (see instructions)  |   |
| Part                             |   |   |
|                                  |   |   |
|                                  |   |   |
| Part 17                          | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.3614_%  Type of nonrecognition transaction (see instructions) \bigsim IRC 351  |   |
| Part<br>17<br>18<br>19           | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000_% (b) After0.3614_%  Type of nonrecognition transaction (see instructions) ▶RC 351 Indicate whether any transfer reported in Part III is subject to any of the following.   |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| Part 17 18 19 a b                | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before0.000 % (b) After0.3614 %  Type of nonrecognition transaction (see instructions) ▶IRC 351  Indicate whether any transfer reported in Part III is subject to any of the following.  Gain recognition under section 904(f)(3) |   |
| Part 17 18 19 a                  | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| Part 17 18 19 a b c              | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| 17<br>18<br>19<br>a<br>b<br>c    | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| Part 17 18 19 a b c d 20         | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |
| Part  17  18  19  a b c d 20 21a | Additional Information Regarding Transfer of Property (see instructions)  Enter the transferor's interest in the foreign transferee corporation before and after the transfer.  (a) Before  |   |

Form **926** (Rev. 12-2017)

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