990-T

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

OMB No. 1545-0687

For calendar year 2016 or other tax year beginning_____, 2016, and ending ▶ Information about Form 990-T and its instructions is available at www.irs.gov/form990t. Department of the Treasury Internal Revenue Service ▶ Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3). Check box if address changed D Employer identification number (Employees' trust, see instructions.) LUMINA FOUNDATION FOR EDUCATION, INC. **B** Exempt under section Print **∠** 501(**C**)(**3**) Number, street, and room or suite no. If a P.O. box, see instructions. 35-1813228 or E Unrelated business activity codes 408(e) 220(e) 30 S MERIDIAN ST, SUITE 700 Type (See instructions.) ☐ 408A 530(a) City or town, state or province, country, and ZIP or foreign postal code 529(a) INDIANAPOLIS, IN 46204 900099 C Book value of all assets at end of year F Group exemption number (See instructions.) ▶ 1,200,746,667 **G** Check organization type ► ✓ 501(c) corporation ☐ 501(c) trust 401(a) trust Other trust Describe the organization's primary unrelated business activity.

PASSIVE INVESTMENTS During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? . . . > \bigcup Yes \bigcup No If "Yes," enter the name and identifying number of the parent corporation. ▶ The books are in care of ▶ JULIE K. SHEWMAKER Telephone number ▶ (317) 951-5300 Unrelated Trade or Business Income (C) Net (A) Income (B) Expenses Gross receipts or sales Less returns and allowances c Balance ▶ 0 1c 2 2 0 Cost of goods sold (Schedule A, line 7) . Gross profit. Subtract line 2 from line 1c . . . 3 3 0 Capital gain net income (attach Schedule D) 4a 256.610 256.610 Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797) 867,412 4b 867,412 4c 0 5 Income (loss) from partnerships and S corporations (attach statement) 5 (1.718.544)(1.718.544)Rent income (Schedule C) 6 6 0 0 7 Unrelated debt-financed income (Schedule E) 7 0 0 0 8 Interest, annuities, royalties, and rents from controlled organizations (Schedule F) 8 0 0 9 0 0 0 Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G) 9 10 0 0 10 Exploited exempt activity income (Schedule I) 0 11 Advertising income (Schedule J) 11 0 12 Other income (See instructions; attach schedule) 12 0 13 (594,522) 13 **Total.** Combine lines 3 through 12 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) 14 30.126 15 15 51.083 Salaries and wages 16 Repairs and maintenance 16 0 17 17 Bad debts 0 18 18 Interest (attach schedule) 19 19 5,081 20 Charitable contributions (See instructions for limitation rules) . 20 21 21 22 Less depreciation claimed on Schedule A and elsewhere on return . . . 22b 2.626 23 129,257 23 24 24 Contributions to deferred compensation plans 25 4.264 26 26 27 Excess readership costs (Schedule J) 27 28 28 484,490 29 29 706.927 **Total deductions.** Add lines 14 through 28 30 Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13 30 (1,301,449)31 Net operating loss deduction (limited to the amount on line 30) 31 32 Unrelated business taxable income before specific deduction. Subtract line 31 from line 30 . . . 32 (1,301,449)33 Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions) 33 34 Unrelated business taxable income. Subtract line 33 from line 32. If line 33 is greater than line 32, enter the smaller of zero or line 32. (1,301,449)

Part	II Ta	ax Computati	on									
35			le as Corporations. S 61 and 1563) check he			tion. C	Controlled grou	qı				
а	Enter yo	our share of the	\$50,000, \$25,000, an		able income brad 3) \$	ckets (i	in that order):					
b		rganization's sh	nare of: (1) Additional 5	5% tax (not more	than \$11,750)	\$						
		_	not more than \$100,00	·	•	\$						
С	Income	tax on the amo	ount on line 34			·)	-	35c		0	
36	Trusts	Taxable at	Trust Rates. See	instructions for	tax computat	ion. I	ncome tax o	on				
	the amo	ount on line 34	from: 🗌 Tax rate sche	edule or 🗌 Sche	dule D (Form 10	41) .)	▶ [36		İ	
37	Proxy t	tax. See instruc	tions)	▶ [37			
38	Alterna	tive minimum ta	ax						38		0	
39	Tax on	Non-Complian	nt Facility Income. Se	ee instructions					39			
40	Total. A	Add lines 37, 38	and 39 to line 35c or	36, whichever ap	plies				40		0	
Part I	V Ta	ax and Payme	ents									
41a	Foreign	tax credit (corpo	orations attach Form 111	18; trusts attach Fo	orm 1116) .	41a						
b	Other c	redits (see instr	ructions)			41b						
С	Genera	Il business cred	it. Attach Form 3800 (s	see instructions)		41c						
d	Credit f	for prior year mi	nimum tax (attach For	m 8801 or 8827)		41d						
е			es 41a through 41d .						41e		0	
42			line 40						42		0	
43			: Form 4255 Form			Other (a	ttach schedule) .		43		0	
44			2 and 43						44		0	
45a	-		rpayment credited to 2			45a	957,916					
b			yments			45b	0					
С	-		rm 8868			45c						
d	_	-	Tax paid or withheld a		•	45d		_				
е		• ,	ee instructions)			45e		_				
f			yer health insurance pr	·	Form 8941) .	45f		_				
g		redits and payr										
	Form		Other		0 Total ►	45g	0					
46	-	-	lines 45a through 45g					_	46	95	7,916	
47			(see instructions). Che						47		0	
48			ess than the total of line	•					48	0.5	0	
49	-	-	6 is larger than the tot			1	•		49		7,916	
50 Part			you want: Credited to a garding Certain Ac				Refunded		50	70	7,916	
								41.			Yes	No
51			2016 calendar year, d nt (bank, securities, or								100	110
			port of Foreign Bank a									
	here ▶		Soft of Foldight Bank t	and i mandai 7.00	, , , , , , , , , , , , , , , , , , ,	intor tri	ic name or the	1010	Jigiri co	ariti y		~
52			he organization receive a	distribution from	or was it the grant	or of or	transferor to a	forei	an trust	2		~
0 2	•	•	s for other forms the o		•	Ji Oi, Oi	transieror to, a	10101	girtiust	• •		
53			x-exempt interest rece			ar ▶	\$		89	.416		
	Under	penalties of perjury, I	I declare that I have examined	this return, including ac	ccompanying schedule	s and sta	atements, and to the			, -	and beli	ef, it is
Sign			Declaration of preparer (other to						May the I			
Here					•				with the	oreparer	shown	below
		ure of officer		Date	Title				(see instru	ictions)?	⊮]Yes [_]No
Paid	<u>'</u>	Print/Type prepare	r's name	Preparer's signature			Date	Cha	ck 🗆 i	. PT	IN	
	2505	NICOLE M BENG	CIK					Che self-	ck □ i employed		00756 ⁻	195
Prepa		Firm's name ▶	CROWE HORWATH LL	LP					's EIN ►		092168	30
Use (אווע	Firm's address ▶	3815 RIVER CROSSING PARK		OFFICE BOX 40977, IN	IDIANAPO	DLIS, IN 46240-0977			(317)		

Form 990-T (2016) Page **3**

(d) 2. Rent received or accrued (a) From personal property (if the percentage of rent for personal property (if the processing property (if the percentage of rent for personal property (if the processing p		(/									~9° ~
2 Purchases	Sche	dule A-Cost of Goods Sol	d. Ent	ter method of in	ventory v	aluation >				-	
3 Cost of labor	1	Inventory at beginning of year		0	6	Inventory a	at e	end of year	6	0	
Additional section 263A costs (attach schedule)	2	Purchases	2	2 0	7	Cost of	go	ods sold. Subtract			
(attach schedule) 4a 0 8 Do the rules of section 263A (with respect to b Other costs (attach schedule) 4b 0 0 property produced or accurized for resale) apply 5 Total. Add lines 1 through 4b 5 0 0 to the organization? v Schedule C — Rent Income (From Real Property and Personal Property Leased With Real Property) (see instructions) 1. Description of property (if the percentage of rent for personal property (if the percen	3	Cost of labor		0							
b Other costs (attach schedule) 5 Total. Add lines 1 through 4b 5 0 1 to the organization?	4a		sts			in Part I, lir	ne	2	7		
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(3)	(1)					%					
(4)	(2)					%					
Enter here and on page 1, Part I, line 7, column (A). Totals Enter here and on page 1, Part I, line 7, column (B).	(3)					%					
Part I, line 7, column (A). Part I, line 7, column (B). Totals	(4)					%					
	Totals							0			0
•			luded i	n column 8							0

Schedule F-Interest, Ann	uities, Roya	Ities, an	nd Rent	s From	Controlled Org	anizations (se	e instruc	ctions)	
					l Organizations	,			
Name of controlled organization	2. Employ identification r	umber 3.		ated income nstructions)	4. Total of specified payments made	5. Part of colum included in the organization's gro	controlling	conne	eductions directly ected with income in column 5
(1)									
(2)									
(3)									
(4)									
Nonexempt Controlled Organiz	zations							ı	
7. Taxable Income		et unrelated income s) (see instructions)		9. Total of specified payments made		Part of column 9 that is included in the controlling organization's gross income		connec	eductions directly cted with income in column 10
(1)									
(2)									
(3)									
(4)									
			<u>'</u>			Add columns 5 Enter here and c Part I, line 8, co	on page 1,	Enter h	columns 6 and 11. here and on page 1, line 8, column (B).
Totals						>	(0	0
Schedule G-Investment I	ncome of a	Section	n 501(c	(7), (9),	or (17) Organi	zation (see inst		-	
1. Description of income		2. Amount of income		3. direc	Deductions ctly connected ach schedule)	4. Set-asides (attach schedule)		5. Total deductions and set-asides (col. 3 plus col. 4)	
(1)									
(2)									
(3)									
(4)									
Totals	Part I,	ere and or line 9, colu	umn (A). 0					Part I, lii	re and on page 1, ne 9, column (B).
Schedule I—Exploited Exe	empt Activi	ty Incon	ne, Oth	er Than	Advertising In	come (see inst	ructions	s)	
1. Description of exploited activi	ity busin	. Gross nrelated ess income n trade or usiness	di conne prod uni	xpenses rectly ected with uction of related ss income	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 from activity that is not unrelated business income	attribu	penses table to mn 5	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1)									
(2)									
(3)									
(4)									
Totals	pag	here and on e 1, Part I, 10, col. (A).	page	ere and on 1, Part I, 0, col. (B).					Enter here and on page 1, Part II, line 26.
Schedule J-Advertising I	ncome (see								
Part I Income From P	•			Consoli	dated Basis				
			1		4. Advertising				7. Excess readership
1. Name of periodical		. Gross vertising ncome	I 3 DIFECT		gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.			dership ests	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

Page 4

Form 990-T (2016)

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.)

Z till dagit 7 dit a lillo k	y in io bacici,					_
1. Name of periodical	2. Gross advertising income	3. Direct advertising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)						
(2)						
(3)						
(4)						
Totals from Part I	0	0				0
	Enter here and on page 1, Part I, line 11, col. (A).	Enter here and on page 1, Part I, line 11, col. (B).				Enter here and on page 1, Part II, line 27.
Totals, Part II (lines 1-5) ▶	0	0				0
Schodula K _ Compansation of	Officers Direct	tore and True	stoos (soo instru	ictions)		

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) OFFICERS		100 %	30,126
(2)		%	
(3)		%	
(4)		%	
Total. Enter here and on page 1, Part II, line 14	30,126		

Form **990-T** (2016)

Name of Partnership	EIN	UBI
INVESTMENTS		
(1) Abrams Capital Partners II, LP	04-3455023	-116,876
(2) AG REALTY FUND IX, LP	47-1483532	131
(3) ALPINE INVESTORS V, LP	46-3847907	-673,955
(4) Archlight Energy Partners Fund IV LP	20-8419824	352,287
(5) BAUPOST VALUE PARTNERS, L.PIV	26-2208448	40,396
(6) Carmel Partners Investment Fund IV, LP	90-0781000	15,748
(7) CHARLESBANK EQUITY FUND VII, LP	32-0280123	-14,043
(8) Charlesbank Equity Fund VIII, LP	47-1109521	-51,310
(9) Energy Capital Partners Mezzanine Opportunities Fund A, LP	90-0811770	83,147
(10) ENERGY SPECTRUM PARTNERS VII LP	47-1453458	-417,637
(11) H.I.G. CAPITAL PARTNERS IV, L.P.	20-5466741	-806
(12) H.I.G. CAPITAL PARTNERS V, L.P.	46-1864052	-19,991
(13) H.I.G. EUROPE CAPITAL PARTNERS, L.P.	98-0533386	68,747
(14) H.I.G. Growth Buyouts & Equity Fund II, L. P.	45-1661689	-3,645
(15) Iron Point Real Estate Partners II	45-2465294	-180,799
(16) IRON POINT REAL ESTATE PARTNERS III, LP	35-2508362	-148,019
(17) Lime Rock Partners VI, L. P.	98-1027307	92,862
(18) MERCED PARTNERS IV, L.P.	36-4756959	-87,835
(19) NATURAL GAS PARTNERS IX, LP	26-0632609	25,455
(20) OCM REAL ESTATE OPPORTUNITIES FUND III, LP	01-0709496	12,226
(21) RETHINK EDUCATION, LP	37-1689659	-932
(22) RIVA CAPITAL PARTNERS IV, LP	36-4804829	-4,401
(23) Starwood Captial Hospitality Fund I-3, LP	98-0459282	-1,169
(24) Stonehill Institutional Partners LP	13-3982121	43,153
(25) Stonelake Opportunity Partners III, LP	80-0878134	-5,294
(26) TAILWATER E&P Opportunity Fund II, LP	47-4098699	-723,084
(27) VENTURE INVESTMENT ASSOCIATES VI, LP	20-5196244	-15,772
(28) WALTON STREET REAL ESTATE FUND V, LP	20-3719884	12,872
	Total for Part I, Line 5	-1,718,544

Taxes and Licenses

Description	Amount
INVESTMENT EXPENSE	
(1) AZ STATE INCOME TAX	50
(2) CA STATE INCOME TAX	10
(3) CT STATE INCOME TAX	113
(4) DC STATE INCOME TAX	250
(5) GA STATE INCOME TAX	1,287
(6) HI STATE INCOME TAX	876
(7) IL STATE INCOME TAX	637
(8) MD STATE INCOME TAX	541
(9) MA STATE INCOME TAX	31
(10) MN STATE INCOME TAX	588
(11) NM STATE INCOME TAX	50
(12) NY STATE INCOME TAX	250
(13) TN STATE INCOME TAX	398
Total	5,081
Total for Part II, Line 19	5,081

Charitable Contributions

Year Generated	Amount Generated	Amount Used in Prior Years	Amount Used in Current Year	Amount Remaining	Contribution Carryover Expires
2015	1,243	0		1,243	2020
2016	1,568	0		1,568	2021
Totals	2,811	0	0	2,811	

Other Deductions

Description	Amount
INVESTMENT EXPENSE	
(1) OCCUPANCY	7,201
(2) LEGAL FEES	7,832
(3) ACCOUNTING FEES	17,450
(4) CONSULTING/OTHER PROFESSIONAL FEES	436,509
(5) TRAVEL	2,365
(6) OTHER MISCELLANEOUS EXPENSE	13,133
Total	484,490
Total for Part II, Line 28	484,490

Net Operating Loss Deduction Carryforward Schedule

Year Generated	Amount Generated	Amount Used in Prior Years	Amount Used in Current Year	Amount Remaining	NOL Expires
2015	3,001,824			3,001,824	2035
2016	1,301,449			1,301,449	2036
Totals	4,303,273	0	0	4,303,273	

General Business Credit

Identifying number

OMB No. 1545-0895

Department of the Treasury Internal Revenue Service (99) Name(s) shown on return

▶ Information about Form 3800 and its separate instructions is at www.irs.gov/form3800. ▶ You must attach all pages of Form 3800, pages 1, 2, and 3, to your tax return.

Attachment Sequence No. 22

LUMIN	A FOUNDATION FOR EDUCATION, INC.		35-1813228	
Part		MT)		
	(See instructions and complete Part(s) III before Parts I and II)			
1	General business credit from line 2 of all Parts III with box A checked	1	3080	
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 2016 (see instructions)	3		
4	Carryforward of general business credit to 2016. Enter the amount from line 2 of Part III with			
	box C checked. See instructions for statement to attach	4		
5	Carryback of general business credit from 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	6	3080	
Part		1 - 1	3000	
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	7		
	• 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:			
0	• Individuals. Enter the amount from Form 6251, line 35			
	· · · · · · · · · · · · · · · · · · ·			
	• Corporations. Enter the amount from Form 4626, line 14	8		
	• Estates and trusts. Enter the amount from Schedule I (Form 1041), line 56			
•	Add the set 7 and 0			
9	Add lines 7 and 8	9		
40				
10a	Foreign tax credit			
b	Certain allowable credits (see instructions)			
С	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	11		
12	Net regular tax. Subtract line 10c from line 7. If zero or less, enter -0-			
	5 · 050/ (05) (1) // (1) // (1) // (05) (1)			
13	Enter 25% (.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	15		
16	Subtract line 15 from line 11. If zero or less, enter -0	16	0	
17	Enter the smaller of line 6 or line 16	17	0	
	C corporations: See the line 17 instructions if there has been an ownership change, acquisition,			
	or reorganization.			

Part	Allowable Credit (Continued)		•	
Note:	If you are not required to report any amounts on lines 22 or 24 below, skip lines 18 through 25 and of	enter	-0- on line 26.	
18	Multiply line 14 by 75% (.75) (see instructions)	18		
19	Enter the greater of line 13 or line 18	19		
20	Subtract line 19 from line 11. If zero or less, enter -0	20	0	
21	Subtract line 17 from line 20. If zero or less, enter -0	21	0	
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 2016 (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	0	
28	Add lines 17 and 26	28		
29	Subtract line 28 from line 27. If zero or less, enter -0	29	0	
30	Enter the general business credit from line 5 of all Parts III with box A checked	30	21752	
31	Reserved	31		
32	Passive activity credits from line 5 of all Parts III with box B checked 22			
33	Enter the applicable passive activity credits allowed for 2016 (see instructions)	33		
34	Carryforward of business credit to 2016. 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 2017. 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	21752	
37	Enter the smaller of line 29 or line 36	37	0	
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	38	0	

Form 3800 (2016) Page 3 Name(s) shown on return Identifying number LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 General Business Credits or Eligible Small Business Credits (see instructions) Complete a separate Part III for each box checked below (see instructions). General Business Credit From a Non-Passive Activity **E** Reserved В General Business Credit From a Passive Activity F Reserved ☐ General Business Credit Carryforwards C **G** Eligible Small Business Credit Carryforwards 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 additional Part III combining amounts from all Parts (a) Description of credit (c) If claiming the credit Enter the appropriate Note: On any line where the credit is from more than one source, a separate Part III is needed for each from a pass-through entity, enter the EIN amount pass-through entity. Investment (Form 3468, Part II only) (attach Form 3468) 1a 1a b 1b С 1c 2762 d Low-income housing (Form 8586, Part I only) 1d 318 Disabled access (Form 8826) (see instructions for limitation) 1e е Renewable electricity, refined coal, and Indian coal production (Form 8835) 1f f 1g g h 1h i 1i 1j Small employer pension plan startup costs (Form 8881) (see instructions for limitation) i k Employer-provided child care facilities and services (Form 8882) (see 1k I Biodiesel and renewable diesel fuels (attach Form 8864) 11 m Low sulfur diesel fuel production (Form 8896) 1m Distilled spirits (Form 8906) 1n n Nonconventional source fuel (carryforward only) 10 0 p 1p Energy efficient appliance (carryforward only) 1q q Alternative motor vehicle (Form 8910) 1r Alternative fuel vehicle refueling property (Form 8911) 1s s t 1t Mine rescue team training (Form 8923) 1u u Agricultural chemicals security (carryforward only) 1v Employer differential wage payments (Form 8932) 1w w Carbon dioxide sequestration (Form 8933) X 1x Qualified plug-in electric drive motor vehicle (Form 8936) 1у Qualified plug-in electric vehicle (carryforward only) 1z z 1aa aa New hire retention (carryforward only) bb General credits from an electing large partnership (Schedule K-1 (Form 1065-B)) 1bb Other. Enhanced oil recovery (Form 8830) and certain other credits . . . 1zz ZZ 2 Add lines 1a through 1zz and enter here and on the applicable line of Part I 2 3080 3 3 Enter the amount from Form 8844 here and on the applicable line of Part II. 4a Investment (Form 3468, Part III) (attach Form 3468) 4a b 4b Biofuel producer (Form 6478) 4c C d Low-income housing (Form 8586, Part II) 4d Renewable electricity, refined coal, and Indian coal production (Form 8835) 4e е f Employer social security and Medicare taxes paid on certain employee tips (Form 8846) 4f 4g g Small employer health insurance premiums (Form 8941) 4h h Increasing research activities (Form 6765). 4i j 4j

Add lines 2, 3, and 5 and enter here and on the applicable line of Part II.

Add lines 4a through 4z and enter here and on the applicable line of Part II.

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4z

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Add lines 4a through 4z and enter here and on the applicable line of Part II.

Add lines 2, 3, and 5 and enter here and on the applicable line of Part II.

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Add lines 4a through 4z and enter here and on the applicable line of Part II.

Add lines 2, 3, and 5 and enter here and on the applicable line of Part II.

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Add lines 4a through 4z and enter here and on the applicable line of Part II.

Add lines 2, 3, and 5 and enter here and on the applicable line of Part II.

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Add lines 4a through 4z and enter here and on the applicable line of Part II.

Add lines 2, 3, and 5 and enter here and on the applicable line of Part II.

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Page 3 Name(s) shown on return Identifying number LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 General Business Credits or Eligible Small Business Credits (see instructions) Complete a separate Part III for each box checked below (see instructions). General Business Credit From a Non-Passive Activity **E** Reserved В General Business Credit From a Passive Activity F Reserved ☐ General Business Credit Carryforwards C **G** Eligible Small Business Credit Carryforwards ☐ 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 additional Part III combining amounts from all Parts (a) Description of credit (c) If claiming the credit Enter the appropriate Note: On any line where the credit is from more than one source, a separate Part III is needed for each from a pass-through entity, enter the EIN amount pass-through entity. Investment (Form 3468, Part II only) (attach Form 3468) 1a 1a 1b b С Increasing research activities (Form 6765) 1c 20-5196244 155 d Low-income housing (Form 8586, Part I only) 1d Disabled access (Form 8826) (see instructions for limitation) 1e е Renewable electricity, refined coal, and Indian coal production (Form 8835) 1f f 1g g h 1h i 1i 1j Small employer pension plan startup costs (Form 8881) (see instructions for limitation) i Employer-provided child care facilities and services (Form 8882) (see k 1k ı Biodiesel and renewable diesel fuels (attach Form 8864) 11 m Low sulfur diesel fuel production (Form 8896) 1m Distilled spirits (Form 8906) 1n n Nonconventional source fuel (carryforward only) 10 0 p 1p Energy efficient appliance (carryforward only) 1q q Alternative motor vehicle (Form 8910) 1r Alternative fuel vehicle refueling property (Form 8911) 1s s t 1t Mine rescue team training (Form 8923) 1u u Agricultural chemicals security (carryforward only) 1v Employer differential wage payments (Form 8932) 1w w Carbon dioxide sequestration (Form 8933) X 1x Qualified plug-in electric drive motor vehicle (Form 8936) 1у Qualified plug-in electric vehicle (carryforward only) 1z z 1aa aa bb General credits from an electing large partnership (Schedule K-1 (Form 1065-B)) 1bb ZZ Other. Enhanced oil recovery (Form 8830) and certain other credits . . . 1zz 2 Add lines 1a through 1zz and enter here and on the applicable line of Part I 2 155 3 3 Enter the amount from Form 8844 here and on the applicable line of Part II. 4a Investment (Form 3468, Part III) (attach Form 3468) 4a b 4b Biofuel producer (Form 6478) 4c С d Low-income housing (Form 8586, Part II) 4d Renewable electricity, refined coal, and Indian coal production (Form 8835) 4e е f Employer social security and Medicare taxes paid on certain employee tips (Form 8846) 4f 4g g h Small employer health insurance premiums (Form 8941) 4h 4i Increasing research activities (Form 6765). j 4j 4z

Add lines 4a through 4z and enter here and on the applicable line of Part II.

Add lines 2, 3, and 5 and enter here and on the applicable line of Part II.

SCHEDULE D (Form 1120)

Department of the Treasury Internal Revenue Service

Capital Gains and Losses

Attach to Form 1120, 1120-F, 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.

OMB No. 1545-0123

► Information about Schedule D (Form 1120) and its separate instructions is at www.irs.gov/form1120.

Employer identification number LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 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 Cost Proceeds 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 (q) 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 with **Box B** checked 0 3 Totals for all transactions reported on Form(s) 8949 91,081 91,081 with **Box C** checked 4 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 91,081 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 10 Totals for all transactions reported on Form(s) 8949 165.529 165,529 with **Box F** checked **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) 14 165,529 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 91,081 165,529 17 Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) 17 18 Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the proper line on other returns. If the corporation has qualified timber gain, also complete Part IV......... 256,610 Note: If losses exceed gains, see Capital losses in the instructions.

Underpayment of Estimated Tax by Corporations

► Attach to the corporation's tax return.

OMB No. 1545-0123

Department of the Treasury Internal Revenue Service

▶ Information about Form 2220 and its separate instructions is at www.irs.gov/form2220.

LUMINA FOUNDATION FOR EDUCATION, INC.

35-1813228 Note: Generally, the corporation isn't required to file Form 2220 (see Part II below for exceptions) because the IRS will figure any penalty

owed and bill the corporation. However, the corporation may still use Form 2220 to figure the penalty. If so, enter the amount from page 2, line 38 on the estimated tax penalty line of the corporation's income tax return, but do not attach Form 2220. **Required Annual Payment** 1 1 Personal holding company tax (Schedule PH (Form 1120), line 26) included on line 1 Look-back interest included on line 1 under section 460(b)(2) for completed long-term contracts or section 167(g) for depreciation under the income forecast method . . . С 2c 3 Subtract line 2d from line 1. If the result is less than \$500, do not complete or file this form. The corporation 0 Enter the tax shown on the corporation's 2015 income tax return. See instructions. Caution: If the tax is zero or the tax year was for less than 12 months, skip this line and enter the amount from line 3 on line 5 4 Required annual payment. Enter the smaller of line 3 or line 4. If the corporation is required to skip line 4, enter Part II Reasons for Filing - Check the boxes below that apply. If any boxes are checked, the corporation must file Form 2220 even if it doesn't owe a penalty. See instructions. The corporation is using the adjusted seasonal installment method. The corporation is using the annualized income installment method. 7 The corporation is a "large corporation" figuring its first required installment based on the prior year's tax. Part III Figuring the Underpayment (a) (b) (c) (d) Installment due dates. Enter in columns (a) through (d) the 15th day of the 4th (Form 990-PF filers: Use 5th month), 6th, 9th, and 12th months of the corporation's tax year 9 04/15/2016 06/15/2016 09/15/2016 12/15/2016 10 Required installments. If the box on line 6 and/or line 7 above is checked, enter the amounts from Schedule A, line 38. If the box on line 8 (but not 6 or 7) is checked, see instructions for the amounts to enter. If none of these boxes are checked, enter 25% (0.25) of line 5 0 above in each column 0 0 0 11 Estimated tax paid or credited for each period. For column (a) only. enter the amount from line 11 on line 15. See instructions. 11 0 0 0 0 Complete lines 12 through 18 of one column before going to the next column. 0 0 0 12 Enter amount, if any, from line 18 of the preceding column 12 13 Add lines 11 and 12 13 0 0 0 0 0 0 14 Add amounts on lines 16 and 17 of the preceding column . . . Subtract line 14 from line 13. If zero or less, enter -0- 15 15 0 0 0 If the amount on line 15 is zero, subtract line 13 from line 14. 16 16 0 0 Underpayment. If line 15 is less than or equal to line 10, subtract line 17 15 from line 10. Then go to line 12 of the next column. Otherwise, go 17 0 0 0 0 Overpayment. If line 10 is less than line 15, subtract line 10 from line 15. Then go to line 12 of the next column 0

Form 2220 (2016) Page **2**

Part	V Figuring the Penalty					
			(a)	(b)	(c)	(d)
19	Enter the date of payment or the 15th day of the 4th month after the close of the tax year, whichever is earlier. (C Corporations with tax years ending June 30 and S corporations: Use 3rd month instead of 4th month. Form 990-PF and Form 990-T filers: Use 5th month instead of 4th month.) See instructions	19	04/15/2016	06/15/2016	09/15/2016	12/15/2016
20	Number of days from due date of installment on line 9 to the date shown on line 19	20	0	0	0	0
21	Number of days on line 20 after 4/15/2016 and before 7/1/2016	21	0	0	0	0
22	Underpayment on line 17 \times Number of days on line 21 \times 4% (0.04)	22	\$ 0	\$ 0	\$ 0	\$ 0
23	Number of days on line 20 after 6/30/2016 and before 10/1/2016	23	0	0	0	0
24	Underpayment on line 17 \times Number of days on line 23 \times 4% (0.04)	24	\$ 0	\$ 0	\$ 0	\$ 0
25	Number of days on line 20 after 9/30/2016 and before 1/1/2017	25	0	0	0	0
26	Underpayment on line 17 × Number of days on line 25 × *%	26	\$ 0	\$ 0	\$ 0	\$ 0
27	Number of days on line 20 after 12/31/2016 and before 4/1/2017	27	0	0	0	0
28	Underpayment on line 17 × Number of days on line 27 × *%	28	\$ 0	\$ 0	\$ 0	\$ 0
29	Number of days on line 20 after 3/31/2017 and before 7/1/2017	29	0	0	0	0
30	Underpayment on line 17 × Number of days on line 29 × *%	30	\$ 0	\$ 0	\$ 0	\$ 0
31	Number of days on line 20 after 6/30/2017 and before 10/1/2017	31	0	0	0	0
32	Underpayment on line 17 × Number of days on line 31 × *%	32	\$ 0	\$ 0	\$ 0	\$ 0
33	Number of days on line 20 after 9/30/2017 and before 1/1/2018	33	0	0	0	0
34	Underpayment on line 17 × Number of days on line 33 × *%	34	\$ 0	\$ 0	\$ 0	\$ 0
35	Number of days on line 20 after 12/31/2017 and before 2/16/2018	35	0	0	0	0
36	Underpayment on line 17 \times $\frac{\text{Number of days on line 35}}{365} \times *\%$	36	\$ 0	\$ 0	\$ 0	\$ 0
37	Add lines 22, 24, 26, 28, 30, 32, 34, and 36	37	\$ 0	\$ 0	\$ 0	\$ 0
38	Penalty. Add columns (a) through (d) of line 37. Enter the total here line for other income tax returns		n Form 1120, lin	e 33; or the con	mparable 38	\$ 0

*Use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter. These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin. To obtain this information on the Internet, access the IRS website at **www.irs.gov**. You can also call 1-800-829-4933 to get interest rate information.

Form 2220 (2016)

Schedule A Adjusted Seasonal Installment Method and Annualized Income Installment Method See instructions.

Form 1120S filers: For lines 1, 2, 3, and 21, below, "taxable income" refers to excess net passive income or the amount on which tax is imposed under section 1374(a), whichever applies.

Part I Adjusted Seasonal Installment Method

Caution: Use this method only if the base period percentage for any 6 consecutive months is at least 70%. See instructions.

			(a)	(b)	(c)	(d)
1	Enter taxable income for the following periods:		, ,		,	First 11 months
a	Tax year beginning in 2013	1a				
b	Tax year beginning in 2014	1b				
С	Tax year beginning in 2015	1c				
2	Enter taxable income for each period for the tax year beginning in					
	2016. See the instructions for the treatment of extraordinary					
	items	2				
3	Enter taxable income for the following periods:		First 4 months	First 6 months	First 9 months	Entire year
а	Tax year beginning in 2013	3a				
b	Tax year beginning in 2014	3b				
С	Tax year beginning in 2015					
4	Divide the amount in each column on line 1a by the amount in					
	column (d) on line 3a	4				
5	Divide the amount in each column on line 1b by the amount in					
	column (d) on line 3b	5				
6	Divide the amount in each column on line 1c by the amount in					
_	column (d) on line 3c	6				
7	Add lines 4 through 6	7				
8 9a	Divide line 7 by 3.0	8 9a				
b	Extraordinary items (see instructions)	9b				
c	Add lines 9a and 9b	9c				
·	, ad into ou and ob					
10	Figure the tax on the amount on line 9c using the instructions for Form 1120, Schedule J, line 2 or comparable line of corporation's return	10				
11a	Divide the amount in columns (a) through (c) on line 3a by the amount in column (d) on line 3a	11a				
b	Divide the amount in columns (a) through (c) on line 3b by the	IIa				
	amount in column (d) on line 3b	11b				
С	Divide the amount in columns (a) through (c) on line 3c by the					
	amount in column (d) on line 3c	11c				
40	And the send of the second of the	40				
12	Add lines 11a through 11c	12				
13	Divide line 12 by 3.0	13				
14	Multiply the amount in columns (a) through (c) of line 10 by					
	columns (a) through (c) of line 13. In column (d), enter the					
	amount from line 10, column (d)	14				
15	Enter any alternative minimum tax for each payment period. See					
	instructions	15				
16 17	Enter any other taxes for each payment period. See instructions	16				
17 10	Add lines 14 through 16	17				
18	Form 2220, lines 1 and 2c. See instructions	18				
19	Total tax after credits. Subtract line 18 from line 17. If zero or					
	less, enter -0	19				

Page 3

Form 2220 (2016) Page **4**

Part	Annualized Income Installment Method					
			(a)	(b)	(c)	(d)
			First	First	First	First
20	Annualization periods (see instructions)	20	months	months	months	months
21	Enter taxable income for each annualization period. See instructions for the treatment of extraordinary items	21				
22	Annualization amounts (see instructions)	22				
23a b c	Annualized taxable income. Multiply line 21 by line 22 Extraordinary items (see instructions)	23a 23b 23c				
24	Figure the tax on the amount on line 23c using the instructions for Form 1120, Schedule J, line 2, or comparable line of corporation's return	24				
25	Enter any alternative minimum tax for each payment period (see instructions)	25				
26	Enter any other taxes for each payment period. See instructions	26				
27	Total tax. Add lines 24 through 26	27				
28	For each period, enter the same type of credits as allowed on Form 2220, lines 1 and 2c. See instructions	28				
29	Total tax after credits. Subtract line 28 from line 27. If zero or less, enter -0-	29				
30	Applicable percentage	30	25%	50%	75%	100%
31	Multiply line 29 by line 30	31				
Part	III Required Installments					
	Note: Complete lines 32 through 38 of one column before completing the next column.		1st installment	2nd installment	3rd installment	4th installment
32	If only Part I or Part II is completed, enter the amount in each column from line 19 or line 31. If both parts are completed, enter the smaller of the amounts in each column from line 19 or line 31.	32				
33	Add the amounts in all preceding columns of line 38. See instructions	33				
34	Adjusted seasonal or annualized income installments. Subtract line 33 from line 32. If zero or less, enter -0	34				
35	Enter 25% (0.25) of line 5 on page 1 of Form 2220 in each column. Note: "Large corporations," see the instructions for line 10 for the amounts to enter	35				
36	Subtract line 38 of the preceding column from line 37 of the preceding column	36				
37	Add lines 35 and 36	37				
38	Required installments. Enter the smaller of line 34 or line 37 here and on page 1 of Form 2220, line 10. See instructions .	38				

Form **4626**

Name

Department of the Treasury Internal Revenue Service **Alternative Minimum Tax—Corporations**

► Attach to the corporation's tax return.

▶ Information about Form 4626 and its separate instructions is at www.irs.gov/form4626.

OMB No. 1545-0123

2016

Employer identification number

LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 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 (1,296,368)2 Adjustments and preferences: 2a 6.995 2b 2c Amortization of circulation expenditures (personal holding companies only) 2d 2e (422)f 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 21 0 2m 1,341,993 2n n 20 3 Pre-adjustment alternative minimum taxable income (AMTI). Combine lines 1 through 20. . . . 52.198 Adjusted current earnings (ACE) adjustment: ACE from line 10 of the ACE worksheet in the instructions 52,198 Subtract line 3 from line 4a. If line 3 exceeds line 4a. enter the difference as a 4b 0 Multiply line 4b by 75% (0.75). Enter the result as a positive amount. 0 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 52,198 6 6 46,978 7 Alternative minimum taxable income. Subtract line 6 from line 5. If the corporation held a residual 7 5,220 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 Exemption. Subtract line 8b from \$40,000 (if completing this line for a member of a controlled group, 40.000 8c 9 9 0 10 0 10 Alternative minimum tax foreign tax credit (AMTFTC). See instructions 11 11 12 12 0 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 . . .

Form 4626, Line 6

Alternative Tax Net Operating Loss Deduction

Year Generated	Amount Generated	Amount Used in Prior Years	Amount Used in Current Year	Amount Remaining	AMT NOL Expires
2015	2,063,123		46,978	2,016,145	2035
Totals	2,063,123	0	46,978	2,016,145	

Sales and Other Dispositions of Capital Assets

▶ Information about Form 8949 and its separate instructions is at www.irs.gov/form8949. Attachment ▶ File with your Schedule D to list your transactions for lines 1b, 2, 3, 8b, 9, and 10 of Schedule D.

Sequence No. 12A

OMB No. 1545-0074

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

Social security number or taxpayer identification number

LUMINA FOUNDATION FOR EDUCATION, INC.

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

broker and may even tell you which box to check. Short-Term. Transactions involving capital assets you held 1 year or less are short term. For long-term Part I 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)

1 (a) Description of property	(b) Date sold or	Proceeds	(e) Cost or other basis. See the Note below	Adjustment, it If you enter an enter a co	(h) Gain or (loss). Subtract column (e)		
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed of (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	(g) Amount of adjustment	from column (d) and combine the result with column (g)
SHORT-TERM GAIN/LOSS FROM INVESTMENTS			91,081				91,081
2 Totals, Add the amounts in columns	20 (d) (o) (d) and	I (b) (aubtraat					
2 Totals. Add the amounts in column negative amounts). Enter each to Schedule D, line 1b (if Box A above above is checked) or line 3 (if Box	tal here and incle is checked), lin	ude on your le 2 (if Box B	91 081	0		0	91 081

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.

Form 8949 (2016) 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 LUMINA FOUNDATION FOR EDUCATION, INC.

2 Totals. Add the amounts in columns (d), (e), (g), and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 8b (if Box D above is checked), line 9 (if Box E

above is checked), or line 10 (if Box F above is checked) ▶

Social security number or taxpayer identification number 35-1813228

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.

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

☐ (E) Long-term transactions ☐ (F) Long-term transactions				is wasn't report	ed to the IF	RS	
1 (a) Description of property	(b) (c) Date sold of disposed of	(c) Date sold or	(d) Proceeds	(e) Cost or other basis. See the Note below	Adjustment, if any, to gain or loss. If you enter an amount in column (g), enter a code in column (f). See the separate instructions.		(h) Gain or (loss). Subtract column (e)
(Example: 100 sh. XYZ Co.)	(Mo., day, yr.)	disposed of (Mo., day, yr.)	(sales price) (see instructions)	and see Column (e) in the separate instructions	(f) Code(s) from instructions	(g) Amount of adjustment	from column (d) and combine the result with column (g)
LONG-TERM GAIN/LOSS FROM INVESTMENTS			165,529				165,529

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.

165,529

Form **4797**

Sales of Business Property

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

► Attach to your tax return.

Identifying number

Department of the Treasury Internal Revenue Service

Name(s) shown on return

▶ Information about Form 4797 and its separate instructions is at www.irs.gov/form4797.

Attachment Sequence No. 27

OMB No. 1545-0184

LUN	LUMINA FOUNDATION FOR EDUCATION, INC.						35181	3228
1	Enter the gross proceeds substitute statement) that						1	
Pa	rt I 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 sales price	(e) Depreciation allowed or allowable since acquisition	(f) Cost or o basis, plu improvements expense of s	s and	(g) Gain or (loss) Subtract (f) from the sum of (d) and (e)
	Gain, if any, from Form 468	 4, line 39					3	
4	Section 1231 gain from inst	allment sales from	Form 6252, line 26	6 or 37			4	
5	Section 1231 gain or (loss) f						5	
6	Gain, if any, from line 32, from		-				6	
7	Combine lines 2 through 6.						7	0
	Partnerships (except electinstructions for Form 1065,	ting large partne	rships) and S co	rporations. Report	the gain or (loss) f	ollowing the		
	Individuals, partners, S co line 7 on line 11 below and losses, or they were recap Schedule D filed with your r	d skip lines 8 and tured in an earlier eturn and skip line	9. If line 7 is a gar year, enter the g s 8, 9, 11, and 12 l	ain and you didn't h gain from line 7 as below.	ave any prior year s a long-term capital	ection 1231		
8	Nonrecaptured net section	1231 losses from p	orior years. See ins	structions			8	
9	Subtract line 8 from line 7. I	f zero or less, ente	r -0 If line 9 is ze	ro, enter the gain fro	m line 7 on line 12 b	elow. If line		
	9 is more than zero, enter				•	•		
_	capital gain on the Schedule						9	
Par					4			
	Ordinary gains and losses n				1 year or less):	<u> </u>	1	
ORDII	NARY GAIN/LOSS FROM INVESTMENTS	001-01-01T00:00:0	01-01-01T00:00:0	867,412				867,412
								, , , , , , , , , , , , , , , , , , ,
11	Loss, if any, from line 7.						11	()
12	Gain, if any, from line 7 or a						12	0
13							13	
14	Net gain or (loss) from Form						14	
15	Ordinary gain from installment						15	
16	Ordinary gain or (loss) from	_	es from Form 8824				16	207.442
17	Combine lines 10 through 1						17	867,412
18	For all except individual retu and b below. For individual				ne of your return and	skip lines a		
а	If the loss on line 11 includes	a loss from Form	4684, line 35, colun	nn (b)(ii), enter that pa	art of the loss here. E	nter the part		
	of the loss from income-pro							
	used as an employee on Sch						18a	
b	Redetermine the gain or (los	ss) on line 17 exclu	ding the loss, if an	y, on line 18a. Enter	here and on Form 1	040, line 14	18b	

Pa	Gain From Disposition of Property Und (see instructions)	ler Se	ctions 1245, 12	250, 1252, ⁻	1254,	and 1255		
19	(a) Description of section 1245, 1250, 1252, 1254, or 125	5 prope	erty:			(b) Date acq (mo., day,		(c) Date sold (mo., day, yr.)
A								
B								
							-	
	These columns relate to the properties on lines 19A through 19D). ▶	Property A	Property	/ B	Property	, C	Property D
20	Gross sales price (Note: See line 1 before completing.) .	20						
	21 Cost or other basis plus expense of sale							
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:	24						
	Depreciation allowed or allowable from line 22	25a						
	Enter the smaller of line 24 or 25a	200						
26	If section 1250 property: If straight line depreciation was used,							
_0	enter -0- on line 26g, except for a corporation subject to section 291.							
а	Additional depreciation after 1975. See instructions .	26a						
	Applicable percentage multiplied by the smaller of line							
	24 or line 26a. See instructions	26b						
С	Subtract line 26a from line 24. If residential rental property							
	or line 24 isn't more than line 26a, skip lines 26d and 26e	26c						
d	Additional depreciation after 1969 and before 1976	26d						
	Enter the smaller of line 26c or 26d	26e						
	Section 291 amount (corporations only)	26f						
g	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).							
	Soil, water, and land clearing expenses	27a						
	Line 27a multiplied by applicable percentage. See instructions	27b						
	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						
b	Enter the smaller of line 24 or 28a	28b						
29	If section 1255 property:	200						
	Applicable percentage of payments excluded from							
u	income under section 126. See instructions	29a						
b	Enter the smaller of line 24 or 29a. See instructions .	29b						
Sun	nmary of Part III Gains. Complete property colur	nns A	through D throu	gh line 29b l	before	going to lir	ne 30.	
30	Total gains for all properties. Add property columns A thro	ough D,	line 24				30	0
31	Add property columns A through D, lines 25b, 26g, 27c, 2	8b, and	d 29b. Enter here ar	nd on line 13			31	0
32	Subtract line 31 from line 30. Enter the portion from casu							
							32	0
Par _	Recapture Amounts Under Sections 17 (see instructions)	/9 and	3 280F(b)(2) Wh	en Busine	ss Us 	e Drops to) 50% 	or Less
						(a) Section 179	on	(b) Section 280F(b)(2)
33	Section 179 expense deduction or depreciation allowable	in prior	years		33			
34	Recomputed depreciation. See instructions		•		34			
35	Recapture amount. Subtract line 34 from line 33. See the	instruct	ions for where to re	eport	35		0	0

(Rev. December 2013) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

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

OMB No. 1545-0026

Attachment Sequence No. 128

Part	,		
	of transferor		Identifying number (see instructions)
	NA FOUNDATION FOR EDUCATION, INC.	1.4.1	35-1813228
1 a 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
	If not, list the controlling shareholder(s) and their identifying n	number(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
	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 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 n	not treated as such under section 367)
a	Name of partnership	EIN	I of partnership
AG RI	EALTY FUND IX, LP		47-1483532
	·		
b	Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its entire interest in the partnershi		
d	Is the partner disposing of an interest in a limited partners		
	securities market?		
Part	Transferee Foreign Corporation Information (se	ee instructions)	
3 AG RI	Name of transferee (foreign corporation) EALTY IX INVESTMENTS, LP		4a Identifying number , if any 98-1195882
5 199 BA	Address (including country) AY ST., COMMERCE CT. W. C/O 152928 CANADA INC. SUITE 5300, TORONT	O ONTARIO MEI 180 CANADA	4b Reference ID number (see instructions)
6	Country code of country of incorporation or organization (see		
CA 7	Foreign law characterization (see instructions)		
	PORATION		
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 926 (Rev. 12-2013)

Form 926 (Rev. 12-2013) Page **2**

Part III Information Regarding Transfer of Property (see instructions)

ash	VARIOUS	property	(c) Fair market value on date of transfer	basis	(e) Gain recognized on transfer
	VANIOUS		787,352		
tock and ecurities					
stallment oligations,					
count					
ceivables or					
milar property –					
oreign currency					
other property					
enominated in reign currency					
reign currency					
_					
ventory					
_					
ssets subject to					
epreciation					
capture (see					
emp. Regs. sec 367(a)-4T(b))					
angible property					
sed in trade or					
usiness not listed — nder another					
ategory					
tangible					
operty					
operty to be leased					
s described in final and temp. Regs. sec.					
367(a)-4(c))					
roperty to be					
old (as					
escribed in					
emp. Regs. sec 367(a)-4T(d))					
ansfers of oil and					
as working interests					
s described in emp. Regs. sec.					
367(a)-4T(e))					
ther present:					
ther property –					
			\		
upplemental Info	rmation Required To	Be Reported (see inst	ructions):		

Form **926** (Rev. 12-2013)

Form 926 (Rev. 12-2013) Page **3**

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 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 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Form **926** (Rev. 12-2013)

(Rev. December 2013)

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

OMB No. 1545-0026

Department of the Treasury Internal Revenue Service ▶ Attach to your income tax return for the year of the transfer or distribution.

Attachment Sequence No. 128

Name of transferor		Ic	Identifying number (see instructions)		
	NA FOUNDATION FOR EDUCATION, INC.		35-1813228		
1 a 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 se	Yes 🗌 No		
	Controlling shareholder	Identi	ifying number		
С	If the transferor was a member of an affiliated group fill corporation?	•	vas 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 2	Have basis adjustments under section 367(a)(5) been made? 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 o	of partnership		
AHC	NEWBURY PARTNERS (OFFSHORE), LP	9.	8-1088994		
b c d	Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its entire interest in the partnerships the partner disposing of an interest in a limited partners securities market?	ip?	Yes ✓ No on an established		
Part	,	,			
3 1 AHC	Name of transferee (foreign corporation) NEWBURY VENTURES (OFFSHORE) BLOCKER, LP		4a Identifying number , if any 98-1090081		
5	Address (including country) AIN STREET, SUITE 1250, FORT WORTH, TEXAS 76102		4b Reference ID number (see instructions)		
6	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		
or Pa	perwork Reduction Act Notice, see separate instructions.	Cat. No. 16982D	Form 926 (Rev. 12-20 ⁻		

Form 926 (Rev. 12-2013) Page **2**

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	VARIOUS		3,533,383		
tock and ecurities					
-					
stallment oligations,					
count					
ceivables or					
milar property					
reign currency					
other property					
enominated in reign currency					
reign currency					
ventory					
, ,					
ssets subject to epreciation					
capture (see					
mp. Regs. sec.					
367(a)-4T(b))					
angible property sed in trade or					
ısiness not listed					
nder another					
ategory					
tangible operty					
operty to be leased sidescribed in final					
d temp. Regs. sec.					
1.367(a)-4(c))					
operty to be					
old (as					
escribed in emp. Regs. sec.					
1.367(a)-4T(d))					
ansfers of oil and					
s working interests					
described in mp. Regs. sec.					
367(a)-4T(e))					
., .,					
thor property:					
ther property					

Form **926** (Rev. 12-2013)

Form 926 (Rev. 12-2013) Page **3**

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 2.460 % (b) After 2.460 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No Indicate whether the transferor was required to recognize income under final and Temporary Regulations 13 sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Form **926** (Rev. 12-2013)

(Rev. December 2013) Department of the Treasury Internal Revenue Service

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

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

OMB No. 1545-0026

Attachment Sequence No. 128

	f transferor	Identifying number (see instructions)		
	NA FOUNDATION FOR EDUCATION, INC.	35-1813228		
1 a b	If the transferor was a corporation, complete questions 1a the lf the transfer was a section 361(a) or (b) transfer, was the tror fewer domestic corporations?	ansferor controlled (under s	Yes . No	
	Controlling shareholder	Ider	ntifying number	
С	If the transferor was a member of an affiliated group fili 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?			
2 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:	actual transferor (but is n	ot treated as such under section 367	
	Name of partnership	EIN of partnership		
b c d	Did the partner pick up its pro rata share of gain on the transf Is the partner disposing of its entire interest in the partnership Is the partner disposing of an interest in a limited partners securities market?	p?	Yes . No on an established	
Part	II Transferee Foreign Corporation Information (se	e instructions)		
3	Name of transferee (foreign corporation)		4a Identifying number, if any	
5	ON CAPITAL, L.P. IV Address (including country)	4b Reference ID number (see instructions)		
6	LOOR TUDOR HOUSE LE BORDAGE, ST. PETER PORT, ST PETER I Country code of country of incorporation or organization (see		PCIV	
UK 7 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 926 (Rev. 12-201	

Part III Information Regarding Transfer of Property (see instructions)

Cash 7/1/2016 Stock and securities Installment obligations, account receivables or similar property Foreign currency or other property denominated in foreign currency Inventory Assets subject to depreciation recapture (see Temp. Regs. sec. 1.367(a)-4T(b)) Tangible property used in trade or business not listed under another category Intangible property Property to be leased (as described in final and temp. Regs. sec. 1.367(a)-4(c)) Property to be sold (as described in Temp. Regs. sec. 1.367(a)-4T(d)) Transfers of oil and gas working interests (as described in Temp. Regs. sec. 1.367(a)-4T(e)) Temp. Regs. sec. 1.367(a)-4T(e))	property	(c) Fair market value on date of transfer 1,062,947	(e) Gain recognized on transfer
estallment oligations, count ceivables or milar property oreign currency oreig			
stallment ligations, count ceivables or nilar property reign currency other property nominated in reign currency ventory sets subject to preciation capture (see mp. Regs. sec. 367(a)-4T(b)) ngible property ed in trade or siness not listed der another tegory angible operty to be leased of described in final d temp. Regs. sec. 367(a)-4(c)) operty to be lid (as scribed in mp. Regs. sec. 367(a)-4T(d)) as working interests of described in mp. Regs. sec.			
stallment bligations, count ceivables or milar property breign currency other property enominated in reign currency ventory seets subject to expreciation capture (see emp. Regs. sec. 367(a)-4T(b)) angible property ded in trade or usiness not listed dider another attegory tangible operty tangible operty operty to be leased as described in final d temp. Regs. sec. 367(a)-4(c)) operty to be obld (as escribed in emp. Regs. sec. 367(a)-4T(d)) ansfers of oil and s working interests as described in emp. Regs. sec.			
bligations, account ceivables or milar property breign currency other property anominated in reign currency ventory seets subject to perciation capture (see amp. Regs. sec. 367(a)-4T(b)) angible property and in trade or usiness not listed another attegory tangible operty tangible operty tangible operty coperty to be leased as described in final detemp. Regs. sec. 367(a)-4(c)) operty to be old (as asscribed in mp. Regs. sec. 367(a)-4T(d)) ansfers of oil and as working interests as described in mp. Regs. sec.			
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digations, count ceivables or milar property conterproperty content co			
count ceivables or milar property preign currency other property enominated in reign currency ventory seets subject to expreciation capture (see emp. Regs. sec. 367(a)-4T(b)) angible property sed in trade or usiness not listed der another attegory tangible operty to be leased s described in final d temp. Regs. sec. 367(a)-4(c)) coperty to be old (as escribed in emp. Regs. sec. 367(a)-4T(d)) ansfers of oil and as working interests s described in emp. Regs. sec.			
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s described in final d temp. Regs. sec. 367(a)-4(c)) operty to be old (as escribed in emp. Regs. sec. 367(a)-4T(d)) ansfers of oil and s working interests a described in emp. Regs. sec.			
d temp. Regs. sec. 367(a)-4(c)) operty to be old (as escribed in emp. Regs. sec. 367(a)-4T(d)) ansfers of oil and s working interests s described in emp. Regs. sec.			
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hor proporty			
her property			

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.990 % (b) After 0.98637 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

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

OMB No. 1545-0026

Attachment Sequence No. 128

complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership EIN of partnership	Part	,		
If the transferor was a corporation, complete questions 1 a through 1d. If the transfer was a soction 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by 5 or fewer domestic corporations?				
a if the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(a)) by 5 or fewer domestic corporations? Controlling shareholder Identifying number(s): Controlling shareholder Identifying number(s): Controlling shareholder Identifying number(s): Controlling shareholder Identifying number(s): Controlling shareholder Identifying number c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation EIN of parent corporation Ves No		•	1.41	35-1813228
or fewer domestic corporations? b Did the transferor remain existence after the transfer? c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation? Controlling shareholder Controlling shareholder Identifying number Controlling shareholder Identifying number Controlling shareholder Identifying number Corporation: Name of parent corporation Yes No If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation EIN of parent corporation Controlling shareholder Identifying number Person If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation EIN of parent corporation Complete questions 2a through 2d. List the name and EIN of the transferor's partnership: Name of partnership BAUPOST VALUE PARTNERS, LP-IV b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No b Is the partner disposing of its entire interest in the partnership? Se-2208448 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes No d Is the partner disposing of its entire interest in the partnership that is regularly traded on an established securities market? Person Yes No AB CGROUP HOLDINGS PARENT INC Yes No 6 Country code of country of incorporation or organization (see instructions) AB CGROUP GROUP (Country of incorporation or organization (see instructions)			-	tion 202(a)\ b.v. 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	а			
Controlling shareholder Controlling shareholder Identifying number Controlling shareholder Identifying number Identifying number Identifying number Controlling shareholder Identifying number Identifying number Identifying number Identifying number Controlling shareholder Identifying number Identifying number Identifying number Identifying number Controlling shareholder Identifying number Identifying numb	b	·		
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?				
c If the transferor was a member of an affiliated group filing a consolidated return, was it the parent corporation?			1	
corporation?		Controlling shareholder	lde	ntifying number
corporation? Yes No If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation EIN of parent corporation				
corporation? Yes No If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation EIN of parent corporation				
corporation?				
corporation?				
corporation? Yes No If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation EIN of parent corporation				
corporation?		If the transfer of the first of	in a constant of the second	the Alice of County
If not, list the name and employer identification number (EIN) of the parent corporation: Name of parent corporation	С		ing a consolidated return,	
Name of parent corporation EIN of parent corporation d Have basis adjustments under section 367(a)(5) been made?		·	of the perent corporation:	
d Have basis adjustments under section 367(a)(5) been made?		in not, list the name and employer identification number (Ein)	or the parent corporation.	
d Have basis adjustments under section 367(a)(5) been made?		Name of parent corporation	EIN of	parent corporation
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		·		
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				
complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership EIN of partnership	d	Have basis adjustments under section 367(a)(5) been made?		Yes No
complete questions 2a through 2d. a List the name and EIN of the transferor's partnership: Name of partnership EIN of partnership				
Name of partnership BAUPOST VALUE PARTNERS, L.PIV 26-2208448 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes ✓ No c Is the partner disposing of its entire interest in the partnership? Yes ✓ No d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Yes ✓ No Part II Transferee Foreign Corporation Information (see instructions) 3 Name of transferee (foreign corporation) ABC GROUP HOLDINGS PARENT INC 5 Address (including country) 4b Reference ID number (see instructions) ABCGROUP 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)	2		e actual transferor (but is r	not treated as such under section 367),
BAUPOST VALUE PARTNERS, L.PIV 26-2208448 b Did the partner pick up its pro rata share of gain on the transfer of partnership assets? Yes ✓ No c Is the partner disposing of its entire interest in the partnership? Yes ✓ No d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market? Yes ✓ No Part II Transferee Foreign Corporation Information (see instructions) 3 Name of transferee (foreign corporation) ABC GROUP HOLDINGS PARENT INC 5 Address (including country) 2 NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)	•	· · · · · · · · · · · · · · · · · · ·		
BAUPOST VALUE PARTNERS, L.PIV b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	a	· · ·		
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Name of partnership	EIP	of partnership
b Did the partner pick up its pro rata share of gain on the transfer of partnership assets?	BAUP	OST VALUE PARTNERS L.PIV		26-2208448
c Is the partner disposing of its entire interest in the partnership?		·		
d Is the partner disposing of an interest in a limited partnership that is regularly traded on an established securities market?				
Part II Transferee Foreign Corporation Information (see instructions) 3 Name of transferee (foreign corporation) ABC GROUP HOLDINGS PARENT INC 5 Address (including country) 2 NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)	_	· · · · · · · · · · · · · · · · · · ·		
Transferee Foreign Corporation Information (see instructions) Name of transferee (foreign corporation) ABC GROUP HOLDINGS PARENT INC Address (including country) NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA Country code of country of incorporation or organization (see instructions) CA Foreign law characterization (see instructions)	•	securities market?		
ABC GROUP HOLDINGS PARENT INC 5 Address (including country) 2 NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)	Part	II Transferee Foreign Corporation Information (se	ee instructions)	
5 Address (including country) 2 NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)		· · · · · · · · · · · · · · · · · ·		4a Identifying number, if any
2 NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)				Ale Deference ID number
2 NORELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA 6 Country code of country of incorporation or organization (see instructions) CA 7 Foreign law characterization (see instructions)	5	Address (including country)		
7 Foreign law characterization (see instructions)	2 NOF	RELCO DRIVE, TORONTO, ONTARIO, M9L 2X6, CANADA		
7 Foreign law characterization (see instructions)	6	Country code of country of incorporation or organization (see	e instructions)	
· · · · · · · · · · · · · · · · · · ·	CA	<u>-</u> ,		
		,		
CORPORATION 8 Is the transferee foreign corporation a controlled foreign corporation?			ooration?	₩ Vaa □ Na
8 Is the transferee foreign corporation a controlled foreign corporation?				

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
ash	6/30/2016		194,670		
ock and ecurities					
curiles					
stallment oligations,					
count					
ceivables or					
milar property					
reign currency					
other property					
nominated in					
reign currency					
ventory					
Veritory					
sets subject to					
epreciation capture (see					
mp. Regs. sec.					
367(a)-4T(b))					
angible property sed in trade or					
usiness not listed					
nder another					
ategory					
tangible operty					
operty					
operty to be leased					
described in final described in					
367(a)-4(c))					
roperty to be					
old (as					
escribed in					
Temp. Regs. sec. 1.367(a)-4T(d))					
ansfers of oil and					
s working interests					
(as described in					
mp. Regs. sec. 367(a)-4T(e))					
· · · · · · · · · · · · · · · · · · ·					
ther property					
			1	<u> </u>	1
upplemental Info	rmation Required T	o Be Reported (see inst	ructions):		
		(

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.000 % (b) After 0.050038 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No Indicate whether the transferor was required to recognize income under final and Temporary Regulations 13 sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

▶ 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)
LUMII	NA FOUNDATION FOR EDUCATION, INC.		35-1813228
1	If the transferor was a corporation, complete questions 1a thr	ough 1d.	
а	If the transfer was a section 361(a) or (b) transfer, was the 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 n	umber(s):	
	Controlling shareholder	lde	ntifying number
С	If the transferor was a member of an affiliated group filing 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
	Have basis adjustments under section 367(a)(5) been made?		Yes . No
d	riave 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.	actual transferor (but is n	ot treated as such under section 367
а	List the name and EIN of the transferor's partnership:		
	Name of partnership	EIN	I of partnership
BAUP	OST VALUE PARTNERS, L.PIV		26-2208448
b	Did the partner pick up its pro rata share of gain on the transf	er of partnership assets?	Yes 🗸 No
С	Is the partner disposing of its entire interest in the partnership		
d	Is the partner disposing of an interest in a limited partners		
	securities market?		Yes 🗹 No
Part	,	e instructions)	
3 R\/D_I	Name of transferee (foreign corporation) V CAYMAN XI LIMITED		4a Identifying number, if any
5	Address (including country)		4b Reference ID number
	OX 309, UGLAND HOUSE, GEORGE TOWN, GRAND CAYMAN, KY	/1-1104, CAYMAN ISLANDS	(see instructions) BVPIVCAYMANXI01
6 CJ	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	aperwork Reduction Act Notice, see separate instructions.	Cat. No. 16982D	Form 926 (Rev. 12-2013

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
ash	12/21/2016		151,273		
ock and					
ecurities					
stallment					
oligations,					
count ceivables or					
milar property					
preign currency					
other property nominated in					
reign currency					
-					
Inventory					
ssets subject to					
epreciation					
capture (see					
emp. Regs. sec. .367(a)-4T(b))					
angible property					
sed in trade or					
business not listed					
nder another ategory					
,					
tangible					
roperty					
operty to be leased					
s described in final					
nd temp. Regs. sec.					
367(a)-4(c))					
roperty to be					
sold (as described in Temp. Regs. sec. 1.367(a)-4T(d))					
Transfers of oil and gas working interests (as described in					
mp. Regs. sec.					
367(a)-4T(e))					
ther property					
and property					
F					

Form 926	(Rev.	12-2013)
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Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.310992 % (b) After 0.310992 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: Any other income recognition provision contained in the above-referenced regulations 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

▶ 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)
LUMIN	NA FOUNDATION FOR EDUCATION, INC.		35-1813228
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? .		☐ 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
u	Thave basis adjustments under section our (a)(o) been made:		
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
BAUP	POST VALUE PARTNERS, L.PIV		26-2208448
b	Did the partner pick up its pro rata share of gain on the trans	fer of partnership assets?	Yes 🗹 No
С	Is the partner disposing of its entire interest in the partnershi	p?	🗌 Yes 🗹 No
d	Is the partner disposing of an interest in a limited partners	, , ,	
	securities market?		Yes 🗹 No
Part		ee instructions)	1
3 CHIP	Name of transferee (foreign corporation) MOS TECHNOLOGIES INC		4a Identifying number, if any
5	Address (including country)		4b Reference ID number
	R&D ROAD 1, HSINCHU SCIENCE PARK, HSINCHU, TAIWAN		(see instructions) CHIPMOS
6	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 926 (Rev. 12-2013

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	10/31/2016	STOCK	89,224	85,762	3,46
taal and	10/31/2010	3100K	09,224	65,762	3,40
tock and ecurities					
nstallment bligations, ccount eceivables or imilar property					
oreign currency or other property lenominated in oreign currency					
nventory					
Assets subject to depreciation ecapture (see Femp. Regs. sec. 1.367(a)-4T(b))					
angible property used in trade or					
business not listed - under another category					
ntangible					
property					
Property to be leased					
as described in final and temp. Regs. sec. 1.367(a)-4(c))					
Property to be sold (as					
lescribed in emp. Regs. sec. .367(a)-4T(d))					
ransfers of oil and las working interests as described in emp. Regs. sec367(a)-4T(e))					
Other property					
,					

• •	•	•	`	,	

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.000 % (b) After 0.009516 % Type of nonrecognition transaction (see instructions) ▶ IRC SECION 354 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

OMB No. 1545-0026

Attachment ▶ Attach to your income tax return for the year of the transfer or distribution. Sequence No. 128

by 5 Yes No
🗌 Yes 🗌 No
🗌 Yes 🗌 No
er
arent
ation
🗌 Yes 🗌 No
such under section 367
p
Tyes No
Tyes No
shed
🗌 Yes 🗌 No
ng number, if any
98-1242225 e ID number
e ID number ions)
·
· · V Yes No
Form 926 (Rev. 12-201

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

▶ 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)
	IA FOUNDATION FOR EDUCATION, INC.		35-1813228
1 a 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?	ansferor controlled (under	Yes No
	in not, list the controlling shareholder(s) and their identifying h	idiffiber(5).	
	Controlling shareholder	lde	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	FIN of	parent corporation
	Name of parent corporation	LIN OI	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 r	not treated as such under section 367)
_	complete questions 2a through 2d.	dotaar transfer of (but to 1	iot troated as each ariasi section cor,
a	List the name and EIN of the transferor's partnership:	I	
	Name of partnership	EIN	l of partnership
RIVA (CAPITAL PARTNERS IV, LP		36-4804829
	Did the partner pick up its pro rata share of gain on the trans	for of partnership assets?	
b	Is the partner disposing of its entire interest in the partnershi		
d	Is the partner disposing of an interest in a limited partners		
	securities market?		
Part	Transferee Foreign Corporation Information (se	e instructions)	
3 EIGHT	Name of transferee (foreign corporation) FOLD REAL ESTATE CAPITAL FUND IV CAYMAN CORP		4a Identifying number, if any
5	Address (including country)		98-1242225 4b Reference ID number
	KET SQUARE HUTCHINS DRIVE, GRAND CAYMAN, CAYMAN ISLAI	NDS	(see instructions)
6 CJ	Country code of country of incorporation or organization (see	e instructions)	1
7	Foreign law characterization (see instructions)		
CORP 8	ORATION Is the transferee foreign corporation a controlled foreign corporation.	oration?	
	perwork Reduction Act Notice, see separate instructions.	Cat. No. 16982D	Form 926 (Rev. 12-2013

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	SEE WHITEPAPER		SEE WHITEPAPER		
tock and					
ecurities					
stallment					
bligations,					
eceivables or milar property					
oreign currency					
r other property enominated in preign currency					
reign durrency					
ventory					
ssets subject to epreciation					
ecapture (see emp. Regs. sec. .367(a)-4T(b))					
angible property					
sed in trade or usiness not listed					
nder another ategory					
itangible					
roperty					
roperty to be leased					
s described in final and temp. Regs. sec.					
367(a)-4(c))					
roperty to be old (as					
escribed in emp. Regs. sec.					
367(a)-4T(d)) ransfers of oil and					
as working interests s described in					
emp. Regs. sec. 367(a)-4T(e))					
ther property					
			_		Τ΄

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.2815 % (b) After 0.2815 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Part III Information Regarding Transfer of Property (continued)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	VARIOUS		84,118		
Cash	VARIOUS		195,951		

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

OMB No. 1545-0026 Attachment Sequence No. 128

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

Name o	of transferor		Identifying number (see instructions)
LUMIN	NA FOUNDATION FOR EDUCATION, INC.		35-1813228
1 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?	ransferor controlled (under	
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	lde	ntifying number
С	If the transferor was a member of an affiliated group fill 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	List the name and EIN of the transferor's partnership:		
	Name of partnership	EIN	l of partnership
GREA	AT HILL EQUITY PARTNERS IV, LP		26-2787568
b c d	Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its entire interest in the partnershi Is the partner disposing of an interest in a limited partners	p?	
Part	securities market?		Yes 🛂 No
Part 3	Name of transferee (foreign corporation)	e manuchonaj	4a Identifying number, if any
	NTY PARTICPACOES S/A		98-0687065
5 AV AL	Address (including country) LEXANDER GRAHAM BELL, 200, BLOCO D, SALA 1 CAMPINAS, SAC	D PAULO. 13069-030. BRAZIL	4b Reference ID number (see instructions)
6 BR	Country code of country of incorporation or organization (see		
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 926 (Rev. 12-2013

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	SEE WHITEPAPER		SEE WHITEPAPER		
tock and ecurities					
ecunities					
stallment oligations,					
count					
ceivables or					
milar property					
reign currency					
other property					
enominated in					
reign currency					
ventory					
,					
ssets subject to epreciation					
capture (see					
emp. Regs. sec.					
367(a)-4T(b))					
angible property sed in trade or					
usiness not listed					
nder another					
ategory					
tangible roperty					
Горенту					
operty to be leased					
s described in final and temp. Regs. sec.					
367(a)-4(c))					
roperty to be					
old (as					
escribed in					
emp. Regs. sec. .367(a)-4T(d))					
ransfers of oil and					
as working interests					
s described in					
emp. Regs. sec. 367(a)-4T(e))					
ου. (ω) · · (ο))					
-					
ther property					
}					
Supplemental Info	ormation Required To	Be Reported (see inst	tructions):		
			·,-		

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.718648 % (b) After 0.718648 % Type of nonrecognition transaction (see instructions) ▶ IRC 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No Indicate whether the transferor was required to recognize income under final and Temporary Regulations 13 sections 1.367(a)-4 through 1.367(a)-6 for any of the following: Any other income recognition provision contained in the above-referenced regulations 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Part III Information Regarding Transfer of Property (continued)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	3/15/2016		26,173		
Cash	8/9/2016		22,902		
Cash	9/12/2016		9,815		
Cash	9/20/2016		32,717	·	
Cash	10/31/2016		104,694		

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

OMB No. 1545-0026

Attachment ▶ Attach to your income tax return for the year of the transfer or distribution. Sequence No. 128

Name o	of transferor	Identifying number (see instructions)			
LUMIN	NA FOUNDATION FOR EDUCATION, INC.		35-1813228		
1 a b	If the transferor was a corporation, complete questions 1a the lift the transfer was a section 361(a) or (b) transfer, was the tor fewer domestic corporations?	ransferor controlled (under	Yes . No		
	Controlling shareholder	Ido	ntifying number		
		luc			
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 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 36		
-	Name of partnership	EIN	N of partnership		
b c d	Did the partner pick up its pro rata share of gain on the trans Is the partner disposing of its entire interest in the partnersh Is the partner disposing of an interest in a limited partners securities market?	ip?	Yes No		
Part	II Transferee Foreign Corporation Information (se				
3 SANK	Name of transferee (foreign corporation) ATY CREDIT OPPORTUNITIES V-A2, L.P.		4a Identifying number , if any 98-1019961		
5	Address (including country) HANCOCK TOWER 200 CLARENDON STREET, FLOOR 41, BOSTO	ON, MA 02116	4b Reference ID number (see instructions)		
6	Country code of country of incorporation or organization (see	e instructions)			
CJ 7 CORF	Foreign law characterization (see instructions)				
8	Is the transferee foreign corporation a controlled foreign corp	poration?	Yes 🗹 No		
For Pa	aperwork Reduction Act Notice, see separate instructions.	Cat. No. 16982D	Form 926 (Rev. 12-20		

Inc. - 351813228

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized or transfer
ash	VARIOUS		1,278,425		
ock and					
curities					
stallment ligations,					
count					
ceivables or					
nilar property					
reign currency cther property					
nominated in			+		
eign currency					
+					
entory					
+					
sets subject to					
preciation					
capture (see					
mp. Regs. sec.					
367(a)-4T(b))					
ngible property ed in trade or					
siness not listed					
der another					
tegory					
angible					
operty					
perty to be leased					
described in final					
d temp. Regs. sec.					
67(a)-4(c))					
perty to be					
d (as					
scribed in					
867(a)-4T(d))					
nsfers of oil and			+		
working interests					
described in					
np. Regs. sec. 67(a)-4T(e))					
01 (a)-41 (e))					
-					
ner property					
			1		

		•

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 1.180 % (b) After 1.0816 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

Return by a U.S. Transferor of Property to a Foreign Corporation Information about Form 926 and its separate instructions is at www.irs.gov/form926.

▶ 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)		
LUMIN	NA FOUNDATION FOR EDUCATION, INC.		35-1813228		
1	If the transferor was a corporation, complete questions 1a thr	ough 1d.			
а	If the transfer was a section 361(a) or (b) transfer, was the transfer				
_	or fewer domestic corporations?				
b			V Yes L No		
	If not, list the controlling shareholder(s) and their identifying n	umber(s):			
	Controlling shareholder	Ider	ntifying number		
С	If the transferor was a member of an affiliated group filing corporation?	ng 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?				
u	Trave basis adjustments under section 507 (a)(3) been made:				
2	If the transferor was a partner in a partnership that was the complete questions 2a through 2d.	actual transferor (but is n	ot treated as such under section 367		
а	List the name and EIN of the transferor's partnership:				
	Name of partnership	EIN	of partnership		
b	Did the partner pick up its pro rata share of gain on the transf				
C	Is the partner disposing of its entire interest in the partnership				
d	Is the partner disposing of an interest in a limited partnersl securities market?				
Part			<u> </u> fes <u> </u> No		
3	Name of transferee (foreign corporation)		4a Identifying number, if any		
	IEHILL OFFSHORE PARTNERS LIMITED				
5	Address (including country)		4b Reference ID number		
89 N	EXUS WAY, CAMANA BAY, GRAND CAYMAN, KY1-12	05, CAYMAN ISLANDS	(see instructions) SOPL		
6 CJ	Country code of country of incorporation or organization (see	instructions)			
7 CORF	Foreign law characterization (see instructions) PORATION				
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 926 (Rev. 12-201:		

Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	VARIOUS		5,000,000		
tock and					
ecurities					
stallment					
bligations, ccount					
ceivables or					
milar property					
reign currency					
other property					
enominated in reign currency					
,					
ventory					
ssets subject to					
epreciation capture (see					
emp. Regs. sec. 367(a)-4T(b))					
angible property					
sed in trade or					
usiness not listed on the listed of the list					
ategory					
tangible roperty					
Орогту					
operty to be leased s described in final					
id temp. Regs. sec.					
367(a)-4(c))					
operty to be old (as					
escribed in					
emp. Regs. sec. 367(a)-4T(d))					
ansfers of oil and					
s working interests s described in					
mp. Regs. sec.					
367(a)-4T(e))					
ther property					
ł					
		1	ı	I	

Part IV Additional Information Regarding Transfer of Property (see instructions) 9 Enter the transferor's interest in the foreign transferee corporation before and after the transfer: (a) Before 0.000 % (b) After 0.7633 % Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 10 11 Indicate whether any transfer reported in Part III is subject to any of the following: 12 Did this transfer result from a change in the classification of the transferee to that of a foreign corporation? Yes No 13 Indicate whether the transferor was required to recognize income under final and Temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following: 14 Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)? Yes No 15a Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value 17a Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the b If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:

8865

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year
JAN 01 , 2016, and ending DEC 31 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

Name of person filing this return LUMINA FOUNDATION FOR EDUCATION, INC.						Filer's	dentifying i	number							
LUMI	INA FOU	NDATION F	OR EDUCATION	N, INC.				35-1813228							
Filer's	address (i	if you are not	filing this form with	your tax ret	urn)	1 [2	ategories o	· ·	4	ctions a			
						B Filer's					16 _{, a}	nd endi		31	_{, 20} 16
<u>_</u>			ilities: Nonrecour			•			inancing \$			Othe	r\$		
		a member	of a consolidated	group bu	t not the parent	t, enter the	tollow	ing into		out the	parent:				
	Name								EIN						
_	Address									`					
<u>E</u> F			ted specified fore certain other part			eportea on	this to	rm (see	Instruction	ns) .				•	⊔
	IIIIOIIIIa	illon about t	certain other part	iers (see ii	istructions)							4) Checl	k applicabl	e hoy(26)
		(1) Name			(2) Addres	SS		(3)	dentifying n	umber	Catego		Category 2		tructive owner
												,			
	RN CAPI	TAL VENTU	of foreign partners	rship III LP				2(a)	EIN (if any))	98-119	9896			
	620 CONGRESS AVE, SUITE 200 AUSTIN TEXAS 78701							2(b)	Reference	ID num	ber (see i	instr.)			
							3 Co	untry unde		e laws org					
4	Date of		5 Principal place	ce of 6	Principal busin	ness 7 Principal business		8a Fun	ctional c	nal currency 8b Exchange rate			ge rate		
	organiz	organization business			activity code r	number	act	tivity					(se	e ins	tr.)
			CAYMAN ISLAN	IDS	525990)	OTHER	FINANCIA	AL VEHICLES	US					
Н			ng information for		· · ·										
	Name, address, and identifying number of agent (if any) in the United States						☐ Form 1042 ☐ Form 8804 ✔ Form 1065 or 1065-B Service Center where Form 1065 or 1065-B is filed: E-FILE 4 Name and address of person(s) with custody of the books and								
3		ation, if any	of foreign partne	ersnip s ag	ent in country c)I	r	ecords	of the fore	ign part	` '		•		
5	Were a	any special	allocations made	by the for	eign partnershi	p?							► Y	'es	□ No
6			of Forms 8858, eturn (see instruc							eign Dis	sregarded	d Entitio	es,		
7	How is	s this partne	rship classified ι	nder the la	aw of the count	ry in which	n it is or	rganize	d? . ▶						
8a			an interest in the f 503(d)-1(b)(4) or p											'es	☐ No
b	If "Yes	," does the s	eparate unit or cor	nbined sep	arate unit have a	dual conso	olidated	l loss as	defined in	Reg. 1.1	503(d)-1(b	o)(5)(ii)?	►	'es	No
9	Does t	this partners	ship meet both o	f the follow	ring requiremer	nts?				,					
			's total receipts fo	•						l			□ \	'es	No
			partnership's tot omplete Schedul			e tax year	was les	s than	\$1 million.	J					
Sign H Only If Are Fil This Fo Separa	You ing orm	and belief, i	Ities of perjury, I de t is true, correct, ar of which preparer I	d complete.	. Declaration of p										
Your T	ax	Signat	ure of general partr	er or limited	l liability company	/ member				D:	ate				
Return	_		reparer's name		Preparer's s	•				Date		01 :		TIN	
Paid Prep	a parer		· 									Check self-em	iployed		
Use	Only	Firm's name										Firm's E	EIN ►		

Sch	edule	Constructive Ownership or box b, enter the name, add interest you constructively o	lress, and U.S. taxpayer id	eck thentify	ne boxes that applying number (if any) of th	ne person	you check n(s) whose
		Name	Address	D	Identifying number (i		Check if foreign person	Check if direct partner
Sche	edule	A-1 Certain Partners of Foreign	 n Partnershin (see instructi	ons)				
		Name	Address	0110)	Identifying nun	nber (if	any)	Check if foreign person
		artnership have any other foreign perso	· · · · · · · · · · · · · · · · · · ·			v ,		☐ No
Sche	edule	A-2 Affiliation Schedule. List a direct interest or indirectly or		omes	stic) in which the fo	reign	partnersh	nip owns a
		Name	Address		EIN (if any)		al ordinary me or loss	Check if foreign partnership
Sch	edule	B Income Statement—Trade	or Business Income					
		clude only trade or business income and		belov	w. See the instructions	for mo	ore informa	tion.
	1a	Gross receipts or sales		1a 1b		1c		
	b 2	Cost of goods sold		ID		2		
ခ	3	Gross profit. Subtract line 2 from line				3		
come	4	Ordinary income (loss) from other part		attach	statement)	4		
<u>n</u>	5	Net farm profit (loss) (attach Schedule	e F (Form 1040))			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		
(SU	10	Guaranteed payments to partners .				10		
atio	11	Repairs and maintenance				11		
in Ti	12	Bad debts				12		
for	13 14	Rent				13		
ions	15	Taxes and licenses				15		
truct	16a	Depreciation (if required, attach Form				13		
inst	b	Less depreciation reported elsewhere	-			16c		
es)	17	Depletion (Do not deduct oil and gas				17		
ns	18	Retirement plans, etc				18		
ţi	19	Employee benefit programs				19		
Deductions (see instructions for limitations)	20	Other deductions (attach statement)				20		
De	04	Total deducer Alice	all account to the first transfer of		- 0 41 1 00	0.4		
_	21	Total deductions. Add the amounts s	snown 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	luhtra	ct line 21 from line 8	22		

Calaada	` '	Deutschaft Distribution Observation		Total amount	rage o
Schedu	lle 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		
<u> </u>	4	Guaranteed payments	4		
Income (Loss)	5	Interest income	5		
Ĕ	6	Dividends: a Ordinary dividends	6a		
ခ		b Qualified dividends	- Ou		+
o	7		7		
ျင	7	,			+
_	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)			
	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		
<u>.</u>	13a	Contributions	13a		
Deductions	b	Investment interest expense	13b		
β	С	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)		
ď	d	Other deductions (see instructions) Type ▶	13d		
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a		
Self- mploy ment	b	Gross farming or fishing income	14b		
S III E	C	Gross nonfarm income	14c		
	15a	Low-income housing credit (section 42(j)(5))	15a		_
			15b		
Credits	b	Low-income housing credit (other)			+
	C .	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c		
ວັ	d	Other rental real estate credits (see instructions)			-
	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		
on	С	Gross income sourced at partner level	16c		
Transactions		Foreign gross income sourced at partnership level			
sa	d	Passive category ► f Other (attach statement) ►	16f		
an		Deductions allocated and apportioned at partner level			
Ë	g	Interest expense ► h Other	16h		
п		Deductions allocated and apportioned at partnership level to foreign source income			
ėį.	i	Passive category ► j General category ► k Other (attach statement) ►	16k		
Foreign	1	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 Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		
Alternative Iinimum Ta AMT) Items	c	Depletion (other than oil and gas)	17c		1
n n	d	Oil, gas, and geothermal properties—gross income	17d		
Inite M	e	Oil, gas, and geothermal properties—deductions	17e		_
< ≥ ≤			17f		+
	10 n	Other AMT items (attach statement)			+
Other Information	18a	Tax-exempt interest income	18a		+
ati	b	Other tax-exempt income	18b		1
Ĕ	С	Nondeductible expenses	18c		1
for	19a	Distributions of cash and marketable securities	19a		1
<u>=</u>	b	Distributions of other property	19b		
ē	20 a	Investment income	20a		
¥	b	Investment expenses	20b		
	С	Other items and amounts (attach statement)			

Sche	edule 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	End of 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							

Form 88	865 (2016)					Pa	age 5
Sche	dule M Balance Sho	eets for Interest Allocation	on			·	
					(a) Beginning of tax year	(b) End of tax year	
1	Total U.S. assets						
2	Total foreign assets:						
а	Passive category						
b							
С	Other (attach statement) .						
Sch	edule M-1 Reconciliation 1, is answered	n of Income (Loss) per Boo	oks With	Incon	ne (Loss) per Return. (Not requi	red if Item H9, page	
			6	Inco	ome recorded on books this		
1	Net income (loss) per book	S.		yea	r not included on Schedule K,		
2	Income included on Sched	ule K,		line	s 1 through 11 (itemize):		
	lines 1, 2, 3c, 5, 6a, 7, 8, 9		а	Tax	-exempt interest \$		
	and 11 not recorded on bo	oks					
	this year (itemize):		7	Dec	luctions included on Schedule		
3	Guaranteed payments	(other		K, li	nes 1 through 13d, and 16l not		
	than health insurance)				rged against book income this		
4	Expenses recorded on l	oooks		yea	r (itemize):		
	this year not included	d on	а	Dep	preciation \$		
	Schedule K, lines 1 th	rough					
	13d, and 16l (itemize):						
а	Depreciation \$						
b	Travel and entertainment \$	i	8	Add	d lines 6 and 7		
			9		ome (loss). Subtract line 8		
5	Add lines 1 through 4			fror	n line 5		
					ired if Item H9, page 1, is ans	swered "Yes.")	
1	Balance at beginning of ye	ar	6	Dist	tributions: a Cash		
2	Capital contributed:				b Property		
	a Cash		7	Oth	er decreases (itemize):		
	b Property .						
3	Net income (loss) per book						
4	Other increases (itemize):						
			8	Add	d lines 6 and 7		
			9		ance at end of year. Subtract		
5	Add lines 1 through 4			line	8 from line 5		

Form 8865 (2016)

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 2	Sales of inventory Sales of property rights (patents, trademarks, etc.)				
3	Compensation received for technical, managerial, engineering, construction, or like services				
5	Rents, royalties, and license fees received				
6 7	Distributions received 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				Form 8865 (2016)

SCHEDULE 0

(Form 8865)

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

OMB No. 1545-1668

2016

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

Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865.

Name of transferor		Filer's identifying r	number
LUMINA FOUNDATION FOR EDUCATION, INC.		35-	1813228
Name of foreign partnership	EIN (if any)	Reference ID numl	per (see instructions)
LEADNICADITAL VENTLIDE DADTNEDS III LD	00 1100006		

RN CAPITAL VENTU	IRE PARTNERS III I F)		98-11998	96		
	ers Reportable		on 6038B	70 11770	70		
Type of property	(a) Date of transfer	(b) Number of items transferred	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Section 704(c) allocation method	(f) Gain recognized on transfer	(g) Percentage interes in partnership after transfer
า	VARIOUS		210,118				0.86576
ck, notes vivable and able, and other urities							
ntory							
gible perty d in trade usiness							
ngible perty							
er perty							
	rmation Requi		ction 6038B	ictions):			
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated partner
rt III Is any	transfer report	ad on this sak	andula aubicat to	gain recognition		004(6/0) av	

For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

Cat. No. 25909U

Schedule O (Form 8865) 2016

8865

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year
JAN 01 , 2016, and ending DEC 31 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

		filing this retu						Filer's i	dentifying ı	number					
LUMI	NA FOU	NDATION F	OR EDUCATION	N, INC.							35-1813	3228			
		if you are not AN ST, SUIT IS, IN 46204	filing this form with E 700	your tax ret	urn)	1		2 🗌	ategories o		1	ctions an			
						B Filer's				, 20	16 _{, a}	nd endin		31	_{, 20} 16
<u>_</u>			lities: Nonrecour	•		•			inancing \$			Other	\$		
		a member	of a consolidated	group bu	t not the parent	t, enter the	follow	ing info		out the	parent:				
	Name								EIN						
	Address														
<u>E</u>			ted specified fore			eported on	this for	rm (see	instruction	ns) .					. Ц
F	Informa	ition about c	certain other part	ners (see ir	istructions)							1) Chook	applicable	, hoy/c	20)
		(1) Name			(2) Addres	SS		(3)	dentifying n	umber	Categor		Category 2		ructive owner
											Calogo	,,,,	outogory 2	Conoc	Tuotivo ovinor
	APITAL	and address NATURAL F , 20 GENES	of foreign partner	ership JND II CAY	MAN FEEDER	LP.		2(a)	EIN (if any))				•	
GRA		MAN KY1-1						2(b)	2(b) Reference ID number (see instr.) CDCAPITAL						
								3 Co	untry unde		e laws org AYMAN I	•	S		
4	Date of		5 Principal pla	ce of 6	Principal busin		1	•	ousiness	8a Fun	ctional cu	, I			ge rate
	organiz		business		activity code number a		act	ctivity					(see instr.)		r.)
	11/16/2	2011	CAYMAN ISLAN	NDS	525900		OTHER	FINANCIA	L VEHICLES	US DOI	LAR				
Н			ng information fo												
1	United :		d identifying num	iber of age	nt (if any) in the	3		Form	the foreig 1042 Center where	_ Form	8804	For	rm 1065 d ed:	or 106	5-B
3		and address ation, if any	of foreign partne	ership's ag	ent in country c	of	r	ecords	nd address of the fore ords, if diffe	ign partr	` '		•		
								DMS HOUSE, 20 GENESIS CLOSE, GRAND CAYMAN, KY1-1104, CAYMAN ISLANDS							I-1104,
5	Were a	any special	allocations made	by the for	eign partnershi	p?	·						► □ Y	es [✓ No
6			of Forms 8858 turn (see instruc							eign Dis	regarded	I Entitie	es, ▶		
7			rship classified u							LIMITE	D PART	NERSH	IIP		
8a			an interest in the to 503(d)-1(b)(4) or p	• .	• •		•	•	· .			•		es [□ No
b		_	eparate unit or co				-							es [No
9	Does t	this partners	ship meet both o	f the follow	ring requiremen	nts?									
	• The	partnership'	s total receipts f	or the tax y	ear were less t	han \$250,0	000 and	b)			Y	es [□No
			partnership's to omplete Schedul			e tax year	was les	s than	\$1 million.	}		,			
Sign H Only If Are Fil This Fo	You ing orm ately	and belief, i	Ities of perjury, I de t is true, correct, ar of which preparer	d complete.	Declaration of pr										
Your T		Signati	ure of general partr	er or limited	liability company	/ member		Date							
Return	_		reparer's name	io. Or illilited	Preparer's s	•				Date				TIN	
Paid Pre	i parer	турс р	. oparor o namo		Ποραιοί 3 3	.5.14.410				Duit	I	Check self-emp	□ it	*	
	Only	Firm's name	irm's name 🕨								Firm's E	IN►			

Sch	edule	Constructive Ownership of box b, enter the name, addr interest you constructively ov a Owns a direct interest	ess, and U.S. taxpayer ide			any)	of th	ne person	
		Name	Address	D	Identifying numb			Check if foreign person	Check if direct partner
Sche	edule	A-1 Certain Partners of Foreign	Partnership (see instructi	ons)				l	
		Name	Address		Identifying	numbe	er (if a	any)	Check if foreign person
		artnership have any other foreign person	as a direct partner?					Yes	✓ No
Sche	edule	A-2 Affiliation Schedule. List all direct interest or indirectly over		omes	tic) in which the	e fore	ign	partnersh	
		Name	Address		EIN (if any)			al ordinary me or loss	Check if foreign partnership
Sch	edule	B Income Statement – Trade	or Business Income		<u> </u>				l
Cauti	on: Inc	clude only trade or business income and e	xpenses on lines 1a through 22	belov	v. See the instruct	ions fo	or mo	ore informat	tion.
	1a	Gross receipts or sales		1a		_	1.		
	b 2	Less returns and allowances		1b			1c 2		
<u>o</u>	3	Gross profit. Subtract line 2 from line 1					3		
come	4	Ordinary income (loss) from other partr		 attach	statement)		4		
<u>nc</u>	5	Net farm profit (loss) (attach Schedule					5		
_	6	Net gain (loss) from Form 4797, Part II,					6		
	7	Other income (loss) (attach statement)					7		
	8	Total income (loss). Combine lines 3 to	through 7			.	8		•
	9	Salaries and wages (other than to partr	ners) (less employment credits	s) .			9		
(S)	10	Guaranteed payments to partners					10		
ation	11	Repairs and maintenance					11		
mita	12	Bad debts					12		
Į.	13	Rent					13		
ons	14	Taxes and licenses					14		
ucti	15	Interest					15		
instr	16a	Depreciation (if required, attach Form					160		
see	17	Less depreciation reported elsewhere				_	16c 17		
<u>s</u>	18	Depletion (Do not deduct oil and gas of Retirement plans, etc					18		
jo	19	Employee benefit programs					19		
ŗ	20	Other deductions (attach statement)					20		
Deductions (see instructions for limitations)		deladisono (attachi otatornom)				.			
۵	21	Total deductions. Add the amounts sh	hown in the far right column fo	or line	s 9 through 20 .		21		
	22	Ordinary husiness income (loss) from	trade or husiness activities. S	uhtra	et line 21 from line	8 2	22		

Calaada	` '	Destroyal Distribution Observation	1	Total amount	rage o
Schedu	lle 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)			
7	b	Expenses from other rental activities (attach statement) 3b			
	С	Other net rental income (loss). Subtract line 3b from line 3a	3c		
	4	Guaranteed payments	4		
SC	5	Interest income	5		
Ĕ	6	Dividends: a Ordinary dividends	6a		
Income (Loss)		b Qualified dividends	- Ou		+
	7		7		1
ျင	7	,	8		+
_	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	<u> </u>		_
	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)			
	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		
ti	13a	Contributions	13a		
Deductions	b	Investment interest expense	13b		
eq	С	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)		
Ď	d	Other deductions (see instructions) Type ▶	13d		
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a		
Self- mploy 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		
Credits	С	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c		
ē	d	Other rental real estate credits (see instructions) Type ▶	15d		
O	е	Other rental credits (see instructions) Type ▶	15e		
	f	Other credits (see instructions) Type ▶	15f		
	16a	Name of country or U.S. possession ▶			
40	b	Gross income from all sources	16b		
Suc	С	Gross income sourced at partner level	16c		
Transactions		Foreign gross income sourced at partnership level			
sac	d	Passive category ► e General category ► f Other (attach statement) ►	16f		
an a		Deductions allocated and apportioned at partner level			
F	g	Interest expense ► h Other	16h		
Foreign		Deductions allocated and apportioned at partnership level to foreign source income			
<u>ė</u>	i	Passive category ► j General category ► k Other (attach statement) ►	16k		
ō	ı	Total foreign taxes (check one): ▶ ☐ Paid ☐ Accrued	16 l		
_	m	Reduction in taxes available for credit (attach statement)	16m		
	n	Other foreign tax information (attach statement)			
× .,	17a	Post-1986 depreciation adjustment	17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		
nat Im Ite	С	Depletion (other than oil and gas)	17c		
imi AT)	d	Oil, gas, and geothermal properties—gross income	17d		
Air	е	Oil, gas, and geothermal properties—deductions	17e		
	f	Other AMT items (attach statement)	17f		
Ē	18a	Tax-exempt interest income	18a		
ţi	b	Other tax-exempt income	18b		
na	С	Nondeductible expenses	18c		
Orī	19a	Distributions of cash and marketable securities	19a		
<u>1</u>	b	Distributions of other property	19b		
er	20 a	Investment income	20a		
Other Information	b	Investment expenses	20b		
	С	Other items and amounts (attach statement)			

Sche	edule 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				
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 88	865 (2016)						Page 5
Sche	dule M	Balance Sheets fo	r Interest Allocati	on			·
1 2 a b	Total U.S. ass Total foreign a Passive categ General categ Other (attach	ets				(a) Beginning of tax year	(b) End of tax year
Scne		, is answered "Yes."		OKS WI	tn Incor	ne (Loss) per Return. (Not requi	red if Item H9, page
1 2 3 4	Income includ lines 1, 2, 3c, and 11 not recthis year (item Guaranteed than health insexpenses recthis year in Schedule K, 13d, and 16l Depreciation Stravel and enterthis year and enterthis year in Schedule K, 13d, and 16l Depreciation Stravel and enterthis year in Schedule K, 13d, and 16l Depreciation Stravel and enterthis year in Schedule K, 13d, and 16l Depreciation Stravel and enterthis year.	payments (other surance)			yea line a Tax 7 Dec K, I cha yea a Dep 8 Add 9 Inc	ome recorded on books this ir not included on Schedule K, is 1 through 11 (itemize): c-exempt interest \$ ductions included on Schedule ines 1 through 13d, and 16l not irged against book income this r (itemize):	
5		rough 4			fror	m line 5	1 (0 (11)
1	Balance at be	ginning of year	rs' Capital Accou			iired if Item H9, page 1, is ans tributions: a Cash	swered "Yes.")
3 4		buted: a Cash b Property css) per books . ses (itemize):				b Property	
5	Add lines 1 th	rough 4			9 Bal	d lines 6 and 7	

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 5	Commissions received . Rents, royalties, and license				
	fees received				
6 7	Distributions received 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 0

(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. ▶ Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865.

OMB No. 1545-1668

ame of transferor UMINA FOUNDATION	N EOD EDITICATION	INC				35-181	
ame of foreign partner		IIVC.		EIN (if any)		Reference ID number	
D CAPITAL NATURAL	*	II CAYMAN FEEDE	R LP.	, ,,		CDCAF	
Part I Trans	fers Reportable	Under Sectio	n 6038B				
Type of property	(a) Date of transfer	(b) Number of items transferred	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Section 704(c) allocation method	(f) Gain recognized on transfer	(g) Percentage interest in partnership after transfer
ash	VARIOUS		216,423				10.5263
tock, notes eceivable and ayable, and other ecurities							
ventory							
angible roperty sed in trade r business							
tangible roperty							
ther roperty							
upplemental Info	ormation Requi			actions):			
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
	transfer report n 904(f)(5)(F)? .		nedule subject to	gain recognition			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.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year
JAN 01 , 2016, and ending DEC 31 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

		filing this retu						Filer's i	dentifying	number	05.404				
LUMI	NA FOU	INDATION F	FOR EDUCATION	N, INC.		_					35-1813	3228			
30 S	MERIDIA	if you are not AN ST, SUIT IS, IN 46204		your tax ret	:urn)	1		2 🗌	3 [2 4	4 🔲		DEC		able box(es)):
	,					B Filer's	<u> </u>			, 20	16 _{, a}	nd end		31	_{, 20} 16
<u>C</u>			ilities: Nonrecour	•		-			inancing \$			Othe	er\$		
		s a member	or a consolidated	a group bu	it not the paren	e parent, enter the following information about the parent:									
	Name Address								EIN						
			ted specified fore	sian financ	ial assats are re	norted on	thin for	m (000	inatruatio	no)					
F		nstructions)	sported on	1115 101	III (SEE	IIISII UCIIO	115) .		• •		•	<u> ⊔</u>			
<u> </u>	moma		sortain other part	,						(4	4) Chec	k applicab	le box	(es)	
		(1) Name			(2) Addres	SS		(3)	dentifying r	number	Catego		Category		structive owner
G1 Name and address of foreign partnership GENERATION IM CLIMATE SOLUTIONS FUND II ONE BRYANT PARK 48TH FLOOR								2(a)	EIN (if any	')				•	
	YORK N			2(b)	Reference	ID numl	ber (see i GENE	,							
								1	untry und		,	_		LAND	AND WALES)
4							7 Prir	ncipal b	usiness	8a Fun	ctional c	urrenc	y 8b E	kchar	nge rate
					activity code r	number	act	ivity					(s	ee in	str.)
	4/11/2014 US 5239				523900)	INVESTING US DOL				LAR				
Н	Provide	the following	ng information fo	r the foreig	n partnership's	tax year:									
1	Name, a		d identifying nun	iber of age	ent (if any) in the	e		Form	the foreig 1042 Center wher	Form	8804	□Fo	orm 1065	or 10	065-B
FLOC	organiz ERATION DR, LON	ation, if any N INVESTM DON, ENGL	of foreign partner ENT MANAGEM LAND, WIB 5AN, SCOTLAND AND	ENT LLP, UNITED R	20 AIR STREE	T, 7TH	re	ecords	nd addres of the fore ords, if diff	eign partı	` '		•		ks and uch books
5	Were a	any special	allocations made	by the for	eign partnershi	p?	<u> </u>						▶ □ '	Yes	✓ No
6			r of Forms 8858 eturn (see instruc							reign Dis	regarded	d Entiti	ies, ▶		
7	How is	s this partne	ership classified ι	under the la	aw of the count	ry in which	it is or	ganized	d? . ▶	LIMITE	D PART	NERS	HIP		
8a	Does t	he filer have	an interest in the	foreign part	nership, or an in	terest indire	ectly thre	ough th	e foreign p	artnershi	p, that is	a sepai	rate		
		_	503(d)-1(b)(4) or p				-						_	Yes	∐ No
b			eparate unit or co				olidated	loss as	defined in	Reg. 1.1	503(d)-1(b	o)(5)(ii)?	· L '	Yes	∐ No
9		'	ship meet both o		0 1)					
			's total receipts f		•				5 4	}			▶ □	Yes	☐ No
 The value of the partnership's total assets at the end of the ta If "Yes," do not complete Schedules L, M-1, and M-2. 							was ies	s tnan t	\$1 million.	J					
Sign Here Only If You Are Filing This Form Separately and Not With															
Your Ta	Signature of general partner or limited liability company me									Da	ate				
Paic	ı	Print/Type p	oreparer's name		Preparer's s	ignature				Date		Check self-en	if nployed	PTIN	
-	oarer	Firm's name	e •							1		Firm's			
use	Only											DI			

Sch	edule	box b , enter the name, add interest you constructively o	ress, and U.S. taxpayer ide	entify	ing number (if any) of th	ne person	
		a Owns a direct interest Name	Address	b	Owns a constructive Identifying number (if		Check if foreign	Check if direct
					, , , ,		person	partner
Sobe	edule	A-1 Certain Partners of Foreign	Partnerchin (see instructi	one)				
SCII	eaule	A-1 Certain Partners of Foreign	rarmership (see instruction	0115)				Check if
		Name	Address		Identifying num	ber (if	any)	foreign person
		artnership have any other foreign perso	· · · · · · · · · · · · · · · · · · ·				Yes	∐ No
Sch	edule	Affiliation Schedule. List a direct interest or indirectly or		omes				Check if
		Name	Address		EIN (if any)		al ordinary me or loss	foreign partnership
	edule							
Cauti	on: Inc	clude only trade or business income and	expenses on lines 1a through 22	belov	v. See the instructions	for mo	ore intorma	tion.
	10	Cross resoints or cales		10				
	1a b	Gross receipts or sales		1a 1b		1c		
	2	Cost of goods sold				2		
ne	3	Gross profit. Subtract line 2 from line	1c			3		
come	4	Ordinary income (loss) from other part				4		
<u>=</u>	5	Net farm profit (loss) (attach Schedule				5		
	6	Net gain (loss) from Form 4797, Part II				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		
mita	12	Bad debts				12		
for	13	Rent				13		
ons	14 15	Taxes and licenses				14		
ruct	16a	Interest		16a		13		
inst	b	Less depreciation reported elsewhere	-	16b		16c		
(see	17	Depletion (Do not deduct oil and gas				17		
ns	18	Retirement plans, etc				18		
ctic	19	Employee benefit programs				19		
Deductions (see instructions for limitations)	20	Other deductions (attach statement)				20		
۵	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	ubtrad	ct line 21 from line 8	22		

Schedu		Partners' Distributive Share Items		Total amount	Page 3
Ochicac	1	Ordinary business income (loss) (page 2, line 22)	1	Total alliount	Т
	2	Net rental real estate income (loss) (attach Form 8825)	2		+-
	3a	Other gross rental income (loss)			\vdash
	b	Expenses from other rental activities (attach statement) 3b			
	C	Other net rental income (loss). Subtract line 3b from line 3a	3с		
≅	4	Guaranteed payments	4		+
Income (Loss)	5		5		+
Ĕ	6	Interest income	6a		+-
ခ	0	b Qualified dividends	Va		+-
οu	7	Royalties	7		
nc	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)	Ja		\vdash
	C	Unrecaptured section 1250 gain (attach statement) 9c			
	10	Net section 1231 gain (loss) (attach Form 4797)	10		
	11	OH : (I) / : I I I Time b	11		+-
	12		12		+
ű	13a	Section 179 deduction (attach Form 4562)	13a		+-
Deductions	isa b	Investment interest expense	13b		+-
Ď	C		13c(2)		+-
Õ	d	Section 59(e)(2) expenditures: (1) Type ► (2) Amount ► Other deductions (see instructions)	13d		\vdash
	14a	Net earnings (loss) from self-employment	14a		+-
Self- Employ- ment	b	Gross farming or fishing income	14b		\vdash
S H E	C	Gross nonfarm income	14c		\vdash
Credits	15a		15a		+-
	b	Low-income housing credit (section 42()(3))	15b		+
	C	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c		+
	d	Other rental real estate credits (see instructions) Type	15d		+
Ō	e	Other wentel and dita (and instructions)	15e		+
	f	Other credits (see instructions) Other credits (see instructions) Type	15f		\vdash
	16a	Name of country or U.S. possession ▶			+-
	b	Gross income from all sources	16b		
ns	c	Gross income sourced at partner level	16c		
Ę		Foreign gross income sourced at partnership level			
ac	d	Passive category ► e General category ► f Other (attach statement) ►	16f		
ıns		Deductions allocated and apportioned at partner level			
Transactions	g	Interest expense ► h Other	16h		
<u>_</u>		Deductions allocated and apportioned at partnership level to foreign source income			
Foreign	i	Passive category ▶ j General category ▶ k Other (attach statement) ▶	16k		1
P	ı	Total foreign taxes (check one): ► ☐ Paid ☐ Accrued	161		
-	m	Reduction in taxes available for credit (attach statement)	16m		
	n	Other foreign tax information (attach statement)			
×	17a	Post-1986 depreciation adjustment	17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		
ati In	С	Depletion (other than oil and gas)	17c		
Alternative Iinimum Ta AMT) Items	d	Oil, gas, and geothermal properties—gross income	17d		
A ii A	е	Oil, gas, and geothermal properties—deductions	17e		
	f	Other AMT items (attach statement)	17f		
Ę	18a	Tax-exempt interest income	18a		
Other Information	b	Other tax-exempt income	18b		<u> </u>
Па	С	Nondeductible expenses	18c		
	19a	Distributions of cash and marketable securities	19a		
<u>n</u>	b	Distributions of other property	19b		<u> </u>
er	20 a	Investment income	20a		<u> </u>
)‡	b	Investment expenses	20b		
	С	Other items and amounts (attach statement)		- 000	

Sche	edule 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				
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				

orm 8	865 (2016)				Page \$
Sche	edule M Balance Sheets for Interest	Allocation			
				(a) Beginning of tax year	(b) End of tax year
1	Total U.S. assets				
2	Total foreign assets:				
а	Passive category				
b	General category				
С	Other (attach statement)				
Sch	Reconciliation of Income (Loss 1, is answered "Yes.")	s) per Books Wit	h Incon	ne (Loss) per Return. (Not requi	red if Item H9, page
		6	inco	ome recorded on books this	
1	Net income (loss) per books .		yea	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,		a Tax	-exempt interest \$	
	and 11 not recorded on books				
	this year (itemize):	7	7 Dec	luctions included on Schedule	
3	Guaranteed payments (other			nes 1 through 13d, and 16l not	
	than health insurance)			rged against book income this	
4	Expenses recorded on books		vea	r (itemize):	
-	this year not included on		a Dep	preciation \$	
	Schedule K, lines 1 through				
	13d, and 16l (itemize):				
а	Depreciation \$				
b	Travel and entertainment \$	8	3 Add	lines 6 and 7	
		9) Inco	ome (loss). Subtract line 8	
5	Add lines 1 through 4			n line 5	
	edule M-2 Analysis of Partners' Capita	al Accounts. (No	ot requ	ired if Item H9, page 1, is ans	wered "Yes.")
1	Balance at beginning of year	6	D ist	tributions: a Cash	
2	Capital contributed:			b Property	
	a Cash	7	7 Oth	er decreases (itemize):	
	b Property				
3	Net income (loss) per books .				
4	Other increases (itemize):				
	· · · · · · · · · · · · · · · · · · ·	8	3 Add	l lines 6 and 7	
		9) Bala	ance at end of year. Subtract	
5	Add lines 1 through 4			8 from line 5	

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 2	Sales of inventory Sales of property rights (patents, trademarks, etc.)				
3	Compensation received for technical, managerial, engineering, construction, or like services				
5	Rents, royalties, and license fees received				
6 7	Distributions received 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				Form 8865 (2016)

SCHEDULE 0

(Form 8865)

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

OMB No. 1545-1668

2016

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

Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865.

Name of transferor
LUMINA FOUNDATION FOR EDUCATION, INC.

35-1813228

Name of foreign partnership
EIN (if any)
Reference ID number (see instructions)
GENERATION IM CLIMATE SOLUTIONS FUND II

SENERATION IM CLIMA	TE SOLUTIONS FUI	ND II				GENE	3228
Part I Transfo	ers Reportable	Under Section	on 6038B				
Type of property	(a) Date of transfer	(b) Number of items transferred	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Section 704(c) allocation method	(f) Gain recognized on transfer	(g) Percentage interest in partnership after transfer
ash	VARIOUS		503,320				2.300
tock, notes eceivable and ayable, and other ecurities							
ventory							
angible roperty sed in trade business							
tangible operty							
ther operty							
	rmation Requi		ported (see instru	ctions):			
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated t partner

For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

Cat. No. 25909U

Schedule O (Form 8865) 2016

8865

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year
JAN 01 , 2016, and ending DEC 31 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

		filing this retu						Filer's i	dentifying	number					
LUMI	NA FOU	NDATION F	OR EDUCATION	N, INC.							35-1813	3228			
		if you are not AN ST, SUIT IS, IN 46204	filing this form with FE 700 1	your tax ret	urn)	1		2 🗌	3 [2 4	1 🗆	ctions a			ble box(es)):
						B Filer's				, 20	16 _{, a}	nd endi		31	_{, 20} 16
<u>_</u>			ilities: Nonrecour			•			inancing \$			Othe	er \$		
<u>D</u>		a member	of a consolidated	group bu	not the parent	ne parent, enter the following information about the parent:									
	Name								EIN						
_	Address									``					
<u> </u>	 Check if any excepted specified foreign financial assets a Information about certain other partners (see instructions 						this toi	rm (see	Instructio	ns) .				•	Ц
	ППОППа	ilion about c	ertain other part	istructions)						- 1	4) Chac	k applicab	le hov	(ac)	
		(1) Name		(2) Addres	SS		(3)	dentifying r	number	Catego		Category 2		structive owner	
												,			
	O1 November of Contract of Con														
G1	Name a	and address	of foreign partne	rship	n			2(a)	EIN (if any)					
			DR, SUITE 800	TILS FUN	Ь						90-075				
SAN DIEGO CA 92122								2(b)	Reference	ID numl	oer (see i	instr.)			
								3 Co	untry und		e laws oro AYMAN I	_			
4								•	usiness	8a Fun	ctional c	urrency	' I		ge rate
	organization business activity code					nber activity						(s	ee ins	str.)	
	,				523900		INVESTMENTS US DO					LLAR			
Н			ng information for		<u> </u>										
1	United		d identifying num	iber of age	nt (if any) in the	9	[Form	the foreig 1042 Center wher	Form	8804	□Fo	orm 1065 iled:	or 10	65-B
	organiz LES COF	ation, if any	of foreign partne SERVICES LIMIT RGETOWN, KY1	ED, UGLA	ND HOUSE, S	OUTH	r a FLS	ecords and reco V FUNI	nd addres of the fore ords, if diff O ADMINI Y, SUITE	eign parti erent STRATIO	nership, a	and the	e location LLC, 135	of su	
							Dicc		., 00112	112, 142	· · · · · · · · · · · · · · · · · · ·	., 141 1			
5 6	Enter	the number	allocations made of Forms 8858, eturn (see instruc	Information	on Return of U	J.S. Persor				 reign Dis 	· · · · · · · · · · · · · · · · · · ·	 d Entiti 	_	r es	✓ No
7			ership classified u							LIMITE	D PART	NERS	HIP		
8a			an interest in the f 503(d)-1(b)(4) or p	• .	• •		•	•	٠.					res	□No
b		_	eparate unit or cor				-							′ es	☐ No
9			ship meet both o							Ü	.,.	,,,,,			
	• The	partnership	's total receipts f	or the tax y	ear were less t	han \$250,0	000 and	d)				Yes	□ No
• The value of the partnership's total assets at the end of the tax If "Yes," do not complete Schedules L, M-1, and M-2.							was les	s than :	\$1 million.	}				100	
Sign Here Only If You Are Filing This Form Separately and Not With Your Tax Under penalties of perjury, I declare that I have examined the and belief, it is true, correct, and complete. Declaration of p information of which preparer has any knowledge.						reparer (oth									
Return										P Da	ate				
Paid	d parer	Print/Type p	reparer's name		Preparer's s	ignature				Date		Check self-em	if if if inployed	PTIN	
-		Firm's name	• •									Firm's I	EIN ►		
use	Only											D.			

Sch	edule	box b , enter the name, add interest you constructively o	lress, and U.S. taxpayer ide	entify	ring number (if any	/) of t	he persor	you check n(s) whose
		a Owns a direct interest Name	Address	b	Owns a constructive ldentifying number (i		Check if foreign	Check if direct partner
							person	partner
Sch	edule	A-1 Certain Partners of Foreign	n Partnership (see instructi	ons)				
		Name	Address	,	Identifying nur	nber (if	any)	Check if foreign person
Does	the pa	artnership have any other foreign perso	n as a direct partner?				Yes	│ No
	edule							
		direct interest or indirectly o						
		Name	Address		EIN (if any)		al ordinary ome or loss	Check if foreign partnership
0.1								
	edule	Income Statement—Trade clude only trade or business income and		helov	v See the instruction	s for m	ore informa	tion
- Juan		nade of pasiness income and	expended on lines to through 22		v. ded the metradion	101 111		
	1a	Gross receipts or sales		1a				
	b	Less returns and allowances		1b		1c		
a .	2	Cost of goods sold				2		
come	3	Gross profit. Subtract line 2 from line				3		
00	4	Ordinary income (loss) from other par				4		
<u>_</u>	5 6	Net farm profit (loss) (attach Schedule Net gain (loss) from Form 4797, Part I				5		
	7	Other income (loss) (attach statement				7		
	_	Carta and an area and area and area and area area area area area area area are	,					
	8	Total income (loss). Combine lines 3	through 7			8		
	9	Salaries and wages (other than to par		,		9		
(SL	10	Guaranteed payments to partners .				10		
ation	11	Repairs and maintenance				11		
<u>ii</u>	12 13	Bad debts				12		
s for	14	Taxes and licenses				14		
tion	15	Interest				15		
struc	16a	Depreciation (if required, attach Form		16a	1			
<u>ii</u>	b	Less depreciation reported elsewhere	e on return	16b		16c		
(Se	17	Depletion (Do not deduct oil and gas				17		
ons	18	Retirement plans, etc				18		
Ĕ	19	Employee benefit programs				19		
Deductions (see instructions for limitations)	20	Other deductions (attach statement)				20		
صّ	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	m trade or business activities. S	ubtra	ct line 21 from line 8	22		

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			
	C	Other net rental income (loss). Subtract line 3b from line 3a	3с		
ŝ	4	Guaranteed payments	4		
Income (Loss)	5	Interest income	5		
–	6	Dividends: a Ordinary dividends	6a		
ne		b Qualified dividends 6b			
Ö	7	Royalties	7		
<u>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		İ
	11	Other income (loss) (see instructions) Type ▶	11		
SI	12	Section 179 deduction (attach Form 4562)	12		
jo	13a	Contributions	13a		
rct	b	Investment interest expense	13b		
Deductions	С	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)		
	d	Other deductions (see instructions) Type ▶	13d		
- oy- it	14a	Net earnings (loss) from self-employment	14a		
Self- Employ- ment	b	Gross farming or fishing income	14b		
	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 ▶			
တ	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		
ાટહ	d	Passive category ► e General category ► f Other (attach statement) ►	16f		
<u>ra</u>		Deductions allocated and apportioned at partner level	401-		
T r	g	Interest expense ► h Other	16h		_
Foreign	i	Passive category ► j General category ► k Other (attach statement) ►	16k		
ore	i	Total foreign taxes (check one): ▶ ☐ Paid ☐ Accrued	161		_
ΙĹ	m	Reduction in taxes available for credit (attach statement)	16m		
	n	Other foreign tax information (attach statement)	. 0111		
	17a	Post-1986 depreciation adjustment	17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		
Alternative Iinimum Ta AMT) Items	С	Depletion (other than oil and gas)	17c		
ern m (T)	d	Oil, gas, and geothermal properties—gross income	17d		
Alt AN	е	Oil, gas, and geothermal properties—deductions	17e		
	f	Other AMT items (attach statement)	17f		
Ē	18a	Tax-exempt interest income	18a		
Other Information	b	Other tax-exempt income	18b		
ma	С	Nondeductible expenses	18c		
ori	19a	Distributions of cash and marketable securities	19a		
<u>1</u>	b	Distributions of other property	19b		
ē	20 a	Investment income	20a		<u> </u>
)th	b	Investment expenses	20b		
0	С	Other items and amounts (attach statement)			

Sche	edule 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				
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 88	365 (2016)					Page 5
Sche	edule M Balance	Sheets for Inte	erest Allocation			
					(a) Beginning of tax year	(b) End of tax year
1	Total U.S. assets .					
2	Total foreign assets:					
а	Passive category .					
b	General category .					
С	Other (attach stateme					
Sche	edule M-1 Reconci	liation of Income wered "Yes.")	(Loss) per Books	With In	come (Loss) per Return. (Not requ	ired if Item H9, page
	1, 15 al 150	vered res.)		1 -		
1 2	Net income (loss) per Income included on S lines 1, 2, 3c, 5, 6a, 7 and 11 not recorded of	chedule K, , 8, 9a, 10,			Income recorded on books this year not included on Schedule K, lines 1 through 11 (itemize): Tax-exempt interest \$	
	this year (itemize):			7	Deductions included on Schedule	
3	Guaranteed paymer than health insurance)	,			K, lines 1 through 13d, and 16l not charged against book income this	
4	Expenses recorded this year not inci- Schedule K, lines 13d, and 16l (itemize) Depreciation \$	luded on 1 through		а	year (itemize):	
a h	Travel and entertainm	ont \$		8	Add lines 6 and 7	
D	maver and entertainin	σπ ψ		1	Income (loss). Subtract line 8	
5	Add lines 1 through 4				from line 5	
			apital Accounts	(Not re	equired if Item H9, page 1, is an	swered "Yes.")
1	Balance at beginning				Distributions: a Cash	
2	Capital contributed:	,		1	b Property	
	a Cash	 erty		7	Other decreases (itemize):	
3	Net income (loss) per	books .				
4	Other increases (itemiz	ze):				
				8	Add lines 6 and 7	
5	Add lines 1 through 4			1	Balance at end of year. Subtract line 8 from line 5	

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 5	Commissions received . Rents, royalties, and license				
	fees received				
6 7	Distributions received 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 0

(Form 8865)

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

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

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

Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865.

2016

Name of transferor Filer's identifying number LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 Name of foreign partnership EIN (if any) Reference ID number (see instructions) STEPSTONE SECONDARY OPPORTUNITIES FUND 90-0758768 Part I **Transfers Reportable Under Section 6038B** (b) (e) (g) (f) (a) Type of Number of Fair market Section 704(c) Percentage interest Date of Cost or other Gain recognized on in partnership after property items value on date allocation transfer basis transfer transfer transferred of transfer method Cash **VARIOUS** 655,098 Various Stock, notes receivable and payable, and other securities Inventory Tangible property used in trade or business Intangible property Other property Supplemental Information Required To Be Reported (see instructions): Part II **Dispositions Reportable Under Section 6038B** (f) (b) (e) Depreciation (d) (a) (c) (g) Date of Gain Depreciation Gain allocated recapture Date of Manner of Type of original recognized by recapture allocated to disposition recognized property disposition to partner transfer partnership 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)? . ☐ 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.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year
JAN 01 , 2016, and ending DEC 31 , 20 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

		filing this retu						lier's identifying	number					
LUMI	NA FOU	INDATION F	OR EDUCATION	N, INC.						35-1813228	3			
30 S	MERIDIA	if you are not AN ST, SUIT IS, IN 46204		your tax re	turn)	1 [<u> </u>		4	1 🗌	DE			
	F11 - 1 - 1	la a constant	Tree No.	Φ.		B Filer's		<u> </u>		16 , and e	ilulig	EC 31	, 20	16
C			ilities: Nonrecour of a consolidated	• •	it not the nevent			urse financing \$		-	ther \$			
		a member	or a consolidated	a group bi	at not the parent	, enter the	HOHOWITI	EIN	Jour the	parent.				
	Name Addres	•						EIIN						
			ted specified fore	ian finan	sial acceta ava va		this form	, (aaa inatuustia	201					
F			certain other part			ported on	triis iorii	i (see iristructioi	15) .					
<u> </u>	IIIIOIIIIE	tion about t	citain other part	11013 (300	,					(4) CI	neck applica	able bo	ox(es)	
		(1) Name			(2) Addres	ess (3) Identifying number			Category 1	Categor		onstructiv	/e owner	
	PPORTU	JNITY FUNI		·				2(a) EIN (if any)			-		
UGLA	MAPLES CORPORATE SERVICES LIMITED JGLAND HOUSE, SOUTH CHURCH STREET GRAND CAYMAN KY1-1104							2(b) Reference	ID numb	per (see instr 3DOPPFUN	,			
CAYN	CAYMAN ISLANDS							3 Country under whose laws organized CAYMAN ISLANDS						
4	Date of organiz		5 Principal pla- business	ce of 6	Principal busin activity code n		7 Princ	cipal business ity	8a Functional currency		. ,	8b Exchange rate (see instr.)		
	3/23/2	015	CAYMAN ISLAN	NDS	523990		INVEST	/ESTMENTS US DOLLA			LAR			
Н	Provide	the following	ng information fo	r the forei	gn partnership's	tax year:	•		•					
 Name, address, and identifying number of agent (if any) in the United States Check if the foreign partnership must file: Form 1042 Form 1065 or 1065-B service Center where Form 1065 or 1065-B is filed: 								}						
3 SAME		ation, if any	of foreign partne	ership's aç	gent in country o	f	4 Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different							
							SAME	AS ABOVE; LO	OCATIO	N OF BOOK	S: CAYMA	N ISL	ANDS	;
5	Were	any special	allocations made	by the fo	reign partnershir	o?	<u> </u>				. ▶ 🗌	Yes	V 1	No
6			of Forms 8858 eturn (see instruc		ion Return of U	.S. Persor	ns With	Respect To For	reign Dis	regarded Er	ntities, . ▶			
7	How is	s this partne	rship classified ι	ınder the l	aw of the countr	ry in which	it is org	anized? . 🕨	CAYMAN	SLANDS EXEMPT	ED COMPANY	WITH L	MITED LI	ABILITY
8a			an interest in the 1 503(d)-1(b)(4) or p	• .			•	0 .			. —	Yes		No
b	If "Yes	," does the s	eparate unit or co	mbined sep	oarate unit have a	dual conso	olidated lo	oss as defined in	Reg. 1.15	503(d)-1(b)(5)(ii)? ► 🔲	Yes		No
9			ship meet both o		0 1				١					
			s total receipts f		,	. ,			l		. ▶ □	Yes		No
		s," do not c	partnership's to omplete Schedul	es L, M-1	, and M-2.)					
Only If Are Fili This Fo Separa and No	Under penalties of perjury, I de and belief, it is true, correct, au information of which preparer beparately and Not With				e. Declaration of pr owledge.	eparer (othe	cluding ac er than ge	companying sche neral partner or lir	dules and nited liabil	statements, a ity company n	nd to the be nember) is b	est of r	ny knov on all	wledge
Your Ta		Signat	ure of general partr	ner or limite	d liability company	member			Da	ite				
Paid	l parer	Print/Type p	reparer's name		Preparer's si	gnature			Date		eck if employed	PTIN		
	Only	Firm's name	• •							Firm	ı's EIN ►			
<u> </u>	Cilly	Firm's addre	ess ►							Pho	ne no.			

Sch	edule	box b , enter the name, add interest you constructively o	lress, and U.S. taxpayer ide	entify	ring number (if any	/) of t	he persor	you check n(s) whose
		a Owns a direct interest Name	Address	b	Owns a constructive ldentifying number (i		Check if foreign	Check if direct partner
							person	partner
Sch	edule	A-1 Certain Partners of Foreign	n Partnership (see instructi	ons)				
		Name	Address	,	Identifying nur	nber (if	any)	Check if foreign person
Does	the pa	artnership have any other foreign perso	n as a direct partner?				Yes	│ No
	edule							
		direct interest or indirectly o						
		Name	Address		EIN (if any)		al ordinary ome or loss	Check if foreign partnership
0.1								
	edule	Income Statement—Trade clude only trade or business income and		helov	v See the instruction	s for m	ore informa	tion
- Juan		nade of pasiness income and	expended on lines to through 22		v. ded the metradion	101 111		
	1a	Gross receipts or sales		1a				
	b	Less returns and allowances		1b		1c		
a .	2	Cost of goods sold				2		
come	3	Gross profit. Subtract line 2 from line				3		
00	4	Ordinary income (loss) from other par				4		
<u>_</u>	5 6	Net farm profit (loss) (attach Schedule Net gain (loss) from Form 4797, Part I				5		
	7	Other income (loss) (attach statement				7		
	_	Caracine (rese) (arraen erarennen	,					
	8	Total income (loss). Combine lines 3	through 7			8		
	9	Salaries and wages (other than to par		,		9		
(SL	10	Guaranteed payments to partners .				10		
ation	11	Repairs and maintenance				11		
<u>ii</u>	12 13	Bad debts				12		
s for	14	Taxes and licenses				14		
tion	15	Interest				15		
struc	16a	Depreciation (if required, attach Form		16a	1			
<u>ii</u>	b	Less depreciation reported elsewhere	e on return	16b		16c		
(Se	17	Depletion (Do not deduct oil and gas				17		
ons	18	Retirement plans, etc				18		
Ĕ	19	Employee benefit programs				19		
Deductions (see instructions for limitations)	20	Other deductions (attach statement)				20		
صّ	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	m trade or business activities. S	ubtra	ct line 21 from line 8	22		

Calaada	` '	Deutschaft Distribution Observation		Total amount	rage o
Schedu	lle 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		
<u> </u>	4	Guaranteed payments	4		
Income (Loss)	5	Interest income	5		
Ĕ	6	Dividends: a Ordinary dividends	6a		
ခ		b Qualified dividends	- Ou		+
o	7		7		
ျင	7	,			+
_	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)			
	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		
<u>.</u>	13a	Contributions	13a		
달	b	Investment interest expense	13b		
Deductions	С	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)		
	d	Other deductions (see instructions) Type ▶	13d		
<u> </u>	14a	Net earnings (loss) from self-employment	14a		
Self- Employ- ment	b	Gross farming or fishing income	14b		
S III E	C	Gross nonfarm income	14c		
	15a	Low-income housing credit (section 42(j)(5))	15a		_
			15b		
Credits	b	Low-income housing credit (other)			+
eq	C .	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c		
ວັ	d	Other rental real estate credits (see instructions)			-
	е	Other rental credits (see instructions)	15e		
	f	Other credits (see instructions) Type ▶	15f		
	16a	Name of country or U.S. possession ▶			
S	b	Gross income from all sources	16b		
on	С	Gross income sourced at partner level	16c		
Transactions		Foreign gross income sourced at partnership level			
sa	d	Passive category ► f Other (attach statement) ►	16f		
an		Deductions allocated and apportioned at partner level			
Ë	g	Interest expense ► h Other	16h		
п		Deductions allocated and apportioned at partnership level to foreign source income			
ėį.	i	Passive category ► j General category ► k Other (attach statement) ►	16k		
Foreign	1	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 Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		
Alternative Iinimum Ta AMT) Items	c	Depletion (other than oil and gas)	17c		1
n n	d	Oil, gas, and geothermal properties—gross income	17d		
Inite M	e	Oil, gas, and geothermal properties—deductions	17e		_
< ≥ ≤			17f		+
	10 n	Other AMT items (attach statement)			+
Other Information	18a	Tax-exempt interest income	18a		+
ati	b	Other tax-exempt income	18b		1
Ĕ	С	Nondeductible expenses	18c		1
for	19a	Distributions of cash and marketable securities	19a		1
<u>=</u>	b	Distributions of other property	19b		
ē	20 a	Investment income	20a		
¥	b	Investment expenses	20b		
	С	Other items and amounts (attach statement)			

Sche	edule 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				
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 8	865 (2016)					Page 5
Sche	edule M Bala	nce Sheets for Intere	st Allocation			
					(a) Beginning of tax year	(b) End of tax year
1						
2	Total foreign asse					
а						
b						
С	Other (attach state	ement)	· · · · ·		come (Loss) per Return. (Not requi	
Sch	edule M-1 Reco	onciliation of Income (Lo answered "Yes.")	oss) per Books \	With In	come (Loss) per Return. (Not requi	ired if Item H9, page
				6	Income recorded on books this	
1	Net income (loss)	per books .			year not included on Schedule K,	
2	Income included of	on Schedule K,			lines 1 through 11 (itemize):	
	lines 1, 2, 3c, 5, 6			а	Tax-exempt interest \$	
	and 11 not record					
	this year (itemize):			7	Deductions included on Schedule	
3	Guaranteed pay				K, lines 1 through 13d, and 16l not	
	than health insura	nce)			charged against book income this	
4	Expenses record				year (itemize):	
	this year not			а	Depreciation \$	
	Schedule K, line					
	13d, and 16l (item	nize):				
а	Depreciation \$			_		
b	Travel and enterta	inment \$			Add lines 6 and 7	
_				9	Income (loss). Subtract line 8	
5	Add lines 1 throug			/h I . I	from line 5	1 (() () 11)
			itai Accounts.	<u> </u>	equired if Item H9, page 1, is ans	swered "Yes.")
1	Balance at beginn	• •		6	Distributions: a Cash	
2	Capital contribute	·		_	b Property	
		ash		7	Other decreases (itemize):	
_		roperty				
3	Net income (loss)					
4	Other increases (it	emize):				
				8	Add lines 6 and 7	
				9	Balance at end of year. Subtract	
5	Add lines 1 through	jh 4			line 8 from line 5	

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 5	Commissions received . Rents, royalties, and license				
	fees received				
6 7	Distributions received 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 0

(Form 8865)

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

OMB No. 1545-1668

Department of the Treasury

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

internal Revenue Service	► Information	about Schedule	e O (Form 6005) and i	is separate instructio	iis is at www.irs	s.gov/10/1110005.	
Name of transferor	•					Filer's identifying num	
LUMINA FOUNDATION		NC.				35-181	
Name of foreign partnersl	•			EIN (if any)		Reference ID number	•
3D OPPORTUNITY FUNI)					3DOPP	FUND
Part I Transfe	ers Reportable	Under Section	on 6038B				
Type of property	(a) Date of transfer	(b) Number of items transferred	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Section 704(c) allocation method	(f) Gain recognized on transfer	(g) Percentage interest in partnership after transfer
Cash	VARIOUS		20,002,969				14.7438
Stock, notes							
receivable and payable, and other							
securities							
Inventory							
Tangible							
property							
used in trade							
or business							
Intangible							
property							
Other							
property							
Supplemental Info	rmation Require	ed To Be Re	ported (see instru	uctions):			
Part II Dispos	itions Reportat	ole Under Se	ection 6038B				
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	Gain allocated to partner	(h) Depreciation recapture allocated to partner
		1			1	1	

Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or

For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

Cat. No. 25909U

Schedule O (Form 8865) 2016

✓ No

☐ Yes

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

Part III

Department of the Treasury

Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year

JAN 01 , 2016, and ending DEC 31 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

Name	ne of person filing this return Filer's identifying number													
LUMI	UMINA FOUNDATION FOR EDUCATION, INC. 35-1813228													
		if you are not AN ST, SUIT IS, IN 46204	filing this form with ΓΕ 700 1	your tax ı	return)	1 [2 🗌	3 🔽] 4		ions and		plicable box(es)):
					0.004.004			bogiiiiiig	AN 0	1 , 20	16 _{, an}	d ending		31 , 20 16
<u> </u>			ilities: Nonrecour	•		•		course financi				Other 9	\$	
		a member	of a consolidated	d group b	but not the parent	t, enter the following information about the parent:								
	Name							EIN						
	Address													
<u> </u>					ncial assets are re	ported on	this to	rm (see instru	iction	s)				<u> L</u>
_F	intorma	ition about c	certain other part	ners (see	e instructions)						(4)	Chook	applicable	hoy(oo)
		(1) Name			(2) Addres	ess (3) Identifying n			ing nu	ımber	Category			Constructive owner
											Calogory	1 00	atogory 2	Constructive eviller
G1	Nama	and addrage	of foreign partne	orchin				2(a) EIN (if	: anvi)					
LIME	ROCK F	PARTNERS	VI, L.P.	SISIIIP				2(a) Liiv (ii	arry)		98-1027	307		
			E, 3RD FLOOR					2(b) Refere	ence l	ID numb	er (see in	str)		
WES	IPORI,	CT 06880						=(5) Holord	011001	ib mamb	01 (000 111	o.i.,		
3 Country under whose laws organized CAYMAN ISLANDS														
4	Date of		5 Principal pla	ce of	6 Principal busin	ness	7 Pri	ncipal busine	ss	8a Fund	tional cui	rrency	8b Exc	hange rate
	organiz	ation	business		activity code number			tivity					(se	e instr.)
	12/14/2	2011	CAYMAN ISLAI	NDS	523900 INVES			STMENTS	:	\$US			N/A	
Н	Provide	the following	ng information fo	r the fore	eign partnership's	tax year:							'	
1	Name, United		d identifying nun	nber of a	gent (if any) in the	•	[Check if the form 1042 Service Center EFILED	2	Form	8804	✓ Form		r 1065-B
3		and address ation, if any	of foreign partne	ership's a	agent in country o	f	r £ LIM	Name and add ecords of the and records, it E ROCK MAN DOR, WEST F	foreight f diffe	gn partnerent MENT L	ership, ar .P, 274 R	nd the lo	ocation o	of such books
	Were a	any special	allocations made	by the f	foreign partnership	0?						•	- T Y	es 🔽 No
6				•	ation Return of U		ne With	Respect To	Fore	ian Dier	enarded	Entities		
·			eturn (see instruc									•	·, •	
7	How is	s this partne	rship classified ι	under the	e law of the countr	ry in which	it is o	rganized? .	•	LIMITE	D PARTN	IERSHI	Р	
8a				• .	artnership, or an int		-	•	•				e 🗌 Y e	es 🗌 No
b	If "Yes	," does the s	eparate unit or co	mbined s	eparate unit have a	dual cons	olidated	l loss as define	ed in F	Reg. 1.150	03(d)-1(b)((5)(ii)? ►	□ Ye	es 🗌 No
9	Does t	this partners	ship meet both o	f the follo	owing requiremen	its?								
	• The	partnership ¹	's total receipts f	or the ta	x year were less th	han \$250,	000 an	d		1			. □ Y	es 🗆 No
		s," do not co	omplete Schedul	es L, M-	•					} .				
Sign Ho Only If Are Fili This Fo Separa and No Your Ta	You ng orm itely ot With	and belief, information	t is true, correct, ar of which preparer	nd comple has any ki	Ū	reparer (oth	cluding er than	accompanying general partner	sched or limi	ited liabilit	ty compan	s, and to y membe	the best of the be	of my knowledge ed on all
Return				ner or limit	ted liability company					Dat	ie .			
Paid Pres	l parer	Print/Type p	reparer's name		Preparer's si	gnature		Date			I .	Check Eelf-empl	— i†	ΓΙΝ
	Only	Firm's name	· •								F	irm's EIN	1 ►	
	J. 11.y	Firm's addre	nee >									hone no		

Sch	edule	Outstractive Ownership of	f Partnership Interest. Chec dress, and U.S. taxpayer ider wn. See instructions.		any) of th	ne persor	
		Name	Address	Identifying numb		Check if foreign person	Check if direct partner
Sche	edule	A-1 Certain Partners of Foreign	n Partnership (see instruction	ns)			
		Name	Address	Identifying	number (if a	any)	Check if foreign person
D	41						
	the pa	A-2 Affiliation Schedule. List a direct interest or indirectly o	Il partnerships (foreign or dor	mestic) in which the		<u>Yes</u> partnersh	□ No nip owns a
(055.1)	W. U.T.E.D.	Name	Address	EIN (if any)		al ordinary me or loss	Check if foreign partnership
(SEE V	VHITEPA	APER)					
Soh	edule	B Income Statement—Trade	or Business Income				
		clude only trade or business income and		elow. See the instruct	ions for mo	ore informa	tion.
Income		Gross receipts or sales Less returns and allowances Cost of goods sold Gross profit. Subtract line 2 from line Ordinary income (loss) from other part Net farm profit (loss) (attach Schedule Net gain (loss) from Form 4797, Part I Other income (loss) (attach statement)	1c	1a 1b	1c . 2 . 3 . 4 . 5 . 6		
Deductions (see instructions for limitations)	8 9 10 11 12 13 14 15 16a b 17 18 19 20	Total income (loss). Combine lines 3 Salaries and wages (other than to par Guaranteed payments to partners. Repairs and maintenance. Bad debts	tners) (less employment credits)	6a 6b	. 9 . 10 . 11 . 12 . 13 . 14 . 15 . 16c . 17 . 18 . 19 . 20		
	21	Total deductions. Add the amounts s					
	22	Ordinary husiness income (loss) from	n trade or husiness activities. Sub	otract line 21 from line	8 22		

Schedu		Partners' Distributive Share Items		Total amount	Page 3
Scrieda	1	Ordinary business income (loss) (page 2, line 22)	1	Total alliount	$\overline{}$
	2	Net rental real estate income (loss) (attach Form 8825)	2		_
		Other gross rental income (loss)			
	3a				
	b		20		
	C	Other net rental income (loss). Subtract line 3b from line 3a	3c		_
Income (Loss)	4	Guaranteed payments	4		_
(Lo	5	Interest income	5		
<u>e</u>	6	Dividends: a Ordinary dividends	6a		
ωo	_	b Qualified dividends 6b			
Ü	7	Royalties	7		
_	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)			
	C	Unrecaptured section 1250 gain (attach statement)			
	10	Net section 1231 gain (loss) (attach Form 4797)	10		
	11	Other income (loss) (see instructions) Type ►	11		
Suc	12	Section 179 deduction (attach Form 4562)	12		1
浜	13a	Contributions	13a		
Deductions	b	Investment interest expense	13b		-
)ec	С	Section 59(e)(2) expenditures: (1) Type ► (2) Amount ►	13c(2)		
	d	Other deductions (see instructions) Type ►	13d		
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a		
Self- mploy ment	b	Gross farming or fishing income	14b		
ш	С	Gross nonfarm income	14c		
	15a	0,77	15a		
ts	b	Low-income housing credit (other)	15b		
ğ	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 ▶			
တ္	b	Gross income from all sources	16b		
on	С	Gross income sourced at partner level	16c		
Transactions		Foreign gross income sourced at partnership level			
Sa	d	Passive category ► e General category ► f Other (attach statement) ►	16f		
ца		Deductions allocated and apportioned at partner level			
Ē	g	Interest expense ► h Other	16h		-
Foreign		Deductions allocated and apportioned at partnership level to foreign source income			
re	!	Passive category ► j General category ► k Other (attach statement) ►	16k		
Ξ.	'	Total foreign taxes (check one): ► ☐ Paid ☐ Accrued	161		+
	m	Reduction in taxes available for credit (attach statement)	16m		
	17 -	Other foreign tax information (attach statement)	4-		
ax 1s	17a	Post-1986 depreciation adjustment	17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		+
rna nur	C	Depletion (other than oil and gas)	17c		
nin MT	d	Oil, gas, and geothermal properties—gross income	17d		_
⋖⋸ౖ⋖	e	Oil, gas, and geothermal properties—deductions	17e		
	10 c	Other AMT items (attach statement)	17f		-
Other Information	18a	Tax-exempt interest income	18a		1
ati	b	Other tax-exempt income	18b		+
E	C 10-	Nondeductible expenses	18c		+
<u>Jo</u>	19a	Distributions of cash and marketable securities	19a		-
<u>-</u>	b oo -	Distributions of other property	19b		
hei	20 a	Investment income	20a		-
ᅙ	b	Investment expenses	20b		
	C	Other items and amounts (attach statement)			

Sche	edule 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				
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 8	865 (2016)					Page 5					
Sche	edule M Bala	nce Sheets for Intere	st Allocation								
					(a) Beginning of tax year	(b) End of tax year					
1											
2	Total foreign asse										
а											
b											
С	Other (attach state	ement)	· · · · ·								
Sch	c Other (attach statement)										
				6	Income recorded on books this						
1	Net income (loss)	per books .			year not included on Schedule K,						
2	Income included of	on Schedule K,			lines 1 through 11 (itemize):						
	lines 1, 2, 3c, 5, 6			а	Tax-exempt interest \$						
	and 11 not record										
	this year (itemize):			7	Deductions included on Schedule						
3	Guaranteed pay				K, lines 1 through 13d, and 16l not						
	than health insura	nce)			charged against book income this						
4	Expenses record				year (itemize):						
	this year not			а	Depreciation \$						
	Schedule K, line										
	13d, and 16l (item	nize):									
а	Depreciation \$			_							
b	Travel and enterta	inment \$			Add lines 6 and 7						
_				9	Income (loss). Subtract line 8						
5	Add lines 1 throug			/h I . I	from line 5	1 (() () 11)					
			itai Accounts.	<u> </u>	equired if Item H9, page 1, is ans	swered "Yes.")					
1	Balance at beginn	• •		6	Distributions: a Cash						
2	Capital contribute	·		_	b Property						
		ash		7	Other decreases (itemize):						
_		roperty									
3	Net income (loss)										
4	Other increases (it	emize):									
				8	Add lines 6 and 7						
				9	Balance at end of year. Subtract						
5	Add lines 1 through	jh 4			line 8 from line 5						

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 5	Commissions received . Rents, royalties, and license				
	fees received				
6 7	Distributions received 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)

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

▶ Attach to Form 8865. See Instructions for Form 8865. ▶ Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865.

l control de la control de la control de la control de la control de la control de la control de la control de			
Name of transferor		Filer's identifying r	number
LUMINA FOUNDATION FOR EDUCATION, INC.		35-	-1813228
Name of foreign partnership	EIN (if any)	Reference ID num	ber (see instructions)
LIME ROCK PARTNERS VI, L.P.	98-1027307		

Part I **Transfers Reportable Under Section 6038B** (e) (g) (f) Type of Number of Fair market Section 704(c) Percentage interest Date of Cost or other Gain recognized on in partnership after items value on date allocation property transfer basis transfer transferred of transfer method transfer Cash **VARIOUS** 1.1215 1,746,805 Stock, notes receivable and payable, and other securities Inventory Tangible property used in trade or business Intangible property Other property Supplemental Information Required To Be Reported (see instructions): Part II **Dispositions Reportable Under Section 6038B** (f) (b) (e) Depreciation (d) (a) (c) (g) Date of Gain Depreciation Gain allocated recapture Date of Manner of Type of original recognized by recapture allocated to disposition recognized property disposition to partner transfer partnership 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)? . ☐ Yes ✓ No

For Paperwork Reduction Act Notice, see the Instructions for Form 8865.

Cat. No. 25909U

Schedule O (Form 8865) 2016



Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership
LR-SHELF DRILLING INTERNATIONAL, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	98-1065729		✓
LR-AUGUSTUS HOLDINGS II, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	46-4182367		
AUGUSTUS ENERGY PARTNERS II HOLDING, LLC	2016 GRAND AVE, SUITE A, BILLINGS, MONTANA 59102	46-4408588		
AUGUSTUS ENERGY PARTNERS II, LLC	2016 GRAND AVE, SUITE A, BILLINGS, MONTANA 59102	46-4181288		
LR-BATTLECAT HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	47-2127745		
BATTLECAT MANAGEMENT, LLC	11391 MEADOWGLEN LANE, SUITE D, HOUSTON, TEXAS 77082	47-2327184		
BATTLECAT OIL & GAS HOLDINGS, LLC	11391 MEADOWGLEN LANE, SUITE D, HOUSTON, TEXAS 77082	47-2326882		
LR-CAPSTONE HOLDINGS II, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	47-2023739		
CAPSTONE NATURAL RESOURCES HOLDINGS II, LLC	2250 EAST 73RD STREET, SUITE 500, TULSA, OKLAHOMA 74136	47-2148719		
CAPSTONE NATURAL RESOURCES II, LLC	2250 EAST 73RD STREET, SUITE 500, TULSA, OKLAHOMA 74136	47-2143795		
LR-ENDURANCE HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	46-1547167		
ENDURANCE RESOURCES HOLDINGS, LLC	15455 N. DALLAS PARKWAY, SUITE 1050, ADDISON, TEXAS 75001	90-0917685		
ENDURANCE RESOURCES MANAGEMENT, LLC	15455 N. DALLAS PARKWAY, SUITE 1050, ADDISON, TEXAS 75001	61-1771629		
ENDURANCE RESOURCES, LLC	15455 N. DALLAS PARKWAY, SUITE 1050, ADDISON, TEXAS 75001	32-0291073		
LR-KSWE HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	47-2381277		
KSW ENVIRONMENTAL HOLDINGS, LLC	5800 E SKELLY DR, SUITE 300, TULSA, OKLAHOMA 74135	47-3001987		
KSW ENVIRONMENTAL, LLC	5800 E SKELLY DR, SUITE 300, TULSA, OKLAHOMA 74135	30-0747509		
LR-SDI GAS HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	47-4497804		
SDI GAS HOLDINGS LLC	130 MEADOW RIDGE ROAD, MOUNT MORRIS, PENNSYLVANIA 15349	47-4762248		
LR-VANTAGE HOLDINGS II, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR, WESTPORT, CONNECTICUT 06880	45-5591625		
VANTAGE ENERGY II, LLC	116 INVERNESS DRIVE EAST, SUITE 107, ENGLEWOOD, COLORADO 80112	46-0641608		
VANTAGE ENERGY II ACCESS LLC	116 INVERNESS DRIVE EAST, SUITE 107, ENGLEWOOD, COLORADO 80112	81-3444635		
VANTAGE ENERGY II ALPHA LLC	116 INVERNESS DRIVE EAST, SUITE 107, ENGLEWOOD, COLORADO 80112	81-2766709		
LIME ROCK VII HOLDINGS, LLC	116 INVERNESS DRIVE EAST, SUITE 107, ENGLEWOOD, COLORADO 80112	81-4086996		

8865

Department of the Treasury

Internal Revenue Service

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

► Attach to your tax return.

► Information about Form 8865 and its separate instructions is at www.irs.gov/form8865.

Information furnished for the foreign partnership's tax year
JAN 01 , 2016, and ending DEC 31 beginning

OMB No. 1545-1668

Attachment Sequence No. 118

		filing this retu						Filer's i	dentifying	number					
LUMI	NA FOU	NDATION F	FOR EDUCATION	N, INC.							35-1813	3228			
		if you are not AN ST, SUIT IS, IN 46204	filing this form with ΓΕ 700 4	your tax re	turn)	1 [2 🗌	3 [2 4	1		DEC		ble box(es)):
	F11 - 1	la anna a C l'arla	999 NI	Φ.		2 the startyear seguring , 20 , and chang , 20								, ₂₀ 16	
<u>_</u>			ilities: Nonrecour			Qualified nonrecourse financing \$ Other \$									
		a member	of a consolidated	a group bi	at not the parent	parent, enter the following information about the parent:									
	Name	_							EIN						
_	Address			: <i>6</i> :	:-!		Alada fa	/							
<u>E</u> F			ted specified fore certain other part			eported on	triis ior	m (see	Instructio	ns) .				•	⊔
<u> </u>	IIIIOIIIIa	ttion about c	citain other part	11013 (300	instructions)						(4	4) Chec	k applicabl	e box	(es)
		(1) Name			(2) Addres	dress (3) Identifying			dentifying r	number	Catego		Category 2		tructive owner
	AT POIN	T BIOMEDI	of foreign partne	ership E VALUE I	FUND			2(a)	EIN (if any	')					
		STREET, 3F I, CT 06830	RD FLOOR					2(b)	Reference	ID numl	per (see i BO'	,			
								3 Co	untry und		aws org	_			
4	Date of		5 Principal pla	ce of 6	Principal busin	ness	7 Prir	ncipal b	usiness	8a Fun	ctional c	urrenc	y 8b Ex	chan	ge rate
	organiz	ation	business		activity code r	ty code number activ							(s	ee ins	str.)
	6/1/20	015	CAYMAN ISLAI	NDS	523900	523900 INVEST			TS	US DO	LAR				
Н			ng information fo	`	· ·										
1	United		d identifying nun	iber of ag	ent (if any) in the	9		Form	the foreig 1042 Center wher	Form	8804	□Fo	orm 1065 iled:	or 10	65-B
3		and address ation, if any	of foreign partne	ership's aç	gent in country c	of	re	ecords	nd addres of the fore ords, if diff	eign partı	` '		•		
5	Were a	any special	allocations made	by the fo	reign partnershi	p?							► \ \	/es	✓ No
6	attach	ed to this re	r of Forms 8858 eturn (see instruc	tions) .						reign Dis	regarded	d Entiti	es,		
7	How is	s this partne	ership classified ι	ınder the I	aw of the count	ry in which	it is or	ganized	1? . ▶	LIMITE	D PART	NERS	HIP 		
8a			an interest in the 503(d)-1(b)(4) or p	· .	• •		•	•	٠.					/es	□ No
b			eparate unit or co				olidated	loss as	defined in	Reg. 1.1	503(d)-1(b	o)(5)(ii)?	► <u></u> \	es/	☐ No
9			ship meet both o		0 1)					
			's total receipts f		•				_	ļ			▶ □ '	es (☐ No
			partnership's to omplete Schedul			e tax year	was les	s than S	\$1 million.	J					
Sign H Only If Are Fili This Fo Separa and No	ere You ing orm ately ot With	Under pena and belief, i information	lties of perjury, I de t is true, correct, ar of which preparer	eclare that I nd complete nas any kno	have examined the Declaration of property of property of property of the Declaration of property of the Declaration of property of the Declaration	reparer (oth									
Your T Return		Signat	ure of general parti	ner or limite	d liability company	y member				▼ Da	ate				
Paid	d parer	Print/Type p	reparer's name		Preparer's si	ignature				Date		Check self-en	if if if in ployed	PTIN	
-	Only	Firm's name	· •									Firm's l	EIN►		
U3G	Citiy											-			

Sch	edule	Constructive Ownership of box b, enter the name, addr interest you constructively ov a Owns a direct interest	ess, and U.S. taxpayer id			any)	of th	ne person	
		Name	Address	D	Identifying numb			Check if foreign person	Check if direct partner
Sch	edule	A-1 Certain Partners of Foreign	Partnership (see instructi	ons)				<u> </u>	
		Name	Address		Identifying	numbe	эr (if а	any)	Check if foreign person
		artnership have any other foreign person	· · · · · · · · · · · · · · · · · · ·					Yes	☐ No
Sch	edule	Affiliation Schedule. List all direct interest or indirectly ow		omes	tic) in which the	e fore	ign	partnersh	
		Name	Address		EIN (if any)			al ordinary me or loss	Check if foreign partnership
	edule				0 11 : 1				
Cauti	on: Inc	clude only trade or business income and e	xpenses on lines 1a through 22	belov	v. See the instruct	ions to	or mo	ore informat	tion.
	1a	Gross receipts or sales		1a					
	b	Less returns and allowances		1b			1c		•
	2	Cost of goods sold					2		
πe	3	Gross profit. Subtract line 2 from line 1	C				3		
come	4	Ordinary income (loss) from other partr					4		
<u>Ľ</u>	5	Net farm profit (loss) (attach Schedule					5		
	6	Net gain (loss) from Form 4797, Part II,					6		
	7	Other income (loss) (attach statement)				•	7		
	8	Total income (loss). Combine lines 3 to					8		
	9	Salaries and wages (other than to partr					9		
(SI	10	Guaranteed payments to partners					10		
atior	11	Repairs and maintenance					11		
mit	12	Bad debts					12		
for l	13	Rent					13		
ons	14	Taxes and licenses					14		
ructi	15	Interest					15		
instr	16a b	Depreciation (if required, attach Form 4 Less depreciation reported elsewhere					16c		
see	17	Depletion (Do not deduct oil and gas of				_	17		
S	18	Retirement plans, etc					18		
jo	19	Employee benefit programs					19		
ıct	20	Other deductions (attach statement)					20		
Deductions (see instructions for limitations)		in an analysis (and on ordinarity)		•		·			
	21	Total deductions. Add the amounts sh	nown in the far right column fo	or line	s 9 through 20 .		21		
	22	Ordinary husiness income (loss) from	trade or husiness activities. S	uhtra	et line 21 from line	8	22		

Calaada	` '	Deutschaft Distribution Observation		Total amount	rage o
Schedu	lle 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		
<u> </u>	4	Guaranteed payments	4		
Income (Loss)	5	Interest income	5		
Ĕ	6	Dividends: a Ordinary dividends	6a		
ခ		b Qualified dividends	- Ou		+
o	7		7		
ျင	7	,			+
_	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)			
	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		
<u>.</u>	13a	Contributions	13a		
Deductions	b	Investment interest expense	13b		
β	С	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)		
ď	d	Other deductions (see instructions) Type ▶	13d		
<u> </u>	14a	Net earnings (loss) from self-employment	14a		
Self- mploy ment	b	Gross farming or fishing income	14b		
Self- Employ- ment	C	Gross nonfarm income	14c		
	15a	Low-income housing credit (section 42(j)(5))	15a		_
			15b		
Credits	b	Low-income housing credit (other)			+
eq	C .	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c		
ວັ	d	Other rental real estate credits (see instructions)			-
	е	Other rental credits (see instructions)	15e		
	f	Other credits (see instructions) Type ▶	15f		
	16a	Name of country or U.S. possession ▶			
S	b	Gross income from all sources	16b		
on	С	Gross income sourced at partner level	16c		
Transactions		Foreign gross income sourced at partnership level			
sa	d	Passive category ► f Other (attach statement) ►	16f		
an		Deductions allocated and apportioned at partner level			
Ë	g	Interest expense ► h Other	16h		
п		Deductions allocated and apportioned at partnership level to foreign source income			
ėį.	i	Passive category ► j General category ► k Other (attach statement) ►	16k		
Foreign	1	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 Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b		
Alternative Iinimum Ta AMT) Items	c	Depletion (other than oil and gas)	17c		1
n n	d	Oil, gas, and geothermal properties—gross income	17d		
Inite M	e	Oil, gas, and geothermal properties—deductions	17e		_
< ≥ ≤			17f		+
	10 n	Other AMT items (attach statement)			+
Other Information	18a	Tax-exempt interest income	18a		+
ati	b	Other tax-exempt income	18b		1
Ĕ	С	Nondeductible expenses	18c		1
for	19a	Distributions of cash and marketable securities	19a		1
<u>=</u>	b	Distributions of other property	19b		
ē	20 a	Investment income	20a		
¥	b	Investment expenses	20b		
	С	Other items and amounts (attach statement)			

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				
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				

orm 8	865 (2016)				Page 5
Sche	edule M Balance Sheets for Intere	st Allocation			
				(a) Beginning of tax year	(b) End of tax year
1	Total U.S. assets				
2	Total foreign assets:				
а	Passive category				
b	General category				
С	Other (attach statement)				
Sch	Reconciliation of Income (Lo 1, is answered "Yes.")	ss) per Books \	With Inc	ome (Loss) per Return. (Not requi	red if Item H9, page
			6 Ir	come recorded on books this	
1	Net income (loss) per books .			ear not included on Schedule K,	
2	Income included on Schedule K,		lii	nes 1 through 11 (itemize):	
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		a T	ax-exempt interest \$	
	and 11 not recorded on books				
	this year (itemize):		7 D	eductions included on Schedule	
3	Guaranteed payments (other		K	, lines 1 through 13d, and 16l not	
	than health insurance)			narged against book income this	
4	Expenses recorded on books		У	ear (itemize):	
	this year not included on		a D	epreciation \$	
	Schedule K, lines 1 through				
	13d, and 16l (itemize):				
а					
b	Travel and entertainment \$			dd lines 6 and 7	
				come (loss). Subtract line 8	
	Add lines 1 through 4		fr	om line 5	
	edule M-2 Analysis of Partners' Cap	tal Accounts.			swered "Yes.")
1	Balance at beginning of year		6 D	istributions: a Cash	
2	Capital contributed:			b Property	
	a Cash		7 C	ther decreases (itemize):	
	b Property				
3	Net income (loss) per books .				
4	Other increases (itemize):				
			8 A	dd lines 6 and 7	
				alance at end of year. Subtract	
5	Add lines 1 through 4		li	ne 8 from line 5	

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 of foreign partnership	(a) U.S. person filing this return	(b) Any domestic corporation or partnership controlling or controlled by the U.S. person filing this return	(c) Any other foreign corporation or partnership controlling or controlled by the U.S. person filing 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 2	Sales of inventory Sales of property rights (patents, trademarks, etc.)				
3	Compensation received for technical, managerial, engineering, construction, or like services				
5	Rents, royalties, and license fees received				
6 7	Distributions received 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				Form 8865 (2016)

SCHEDULE O

(Form 8865)

Name of transferor

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

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

OMB No. 1545-1668

Filer's identifying number

Department of the Treasury Internal Revenue Service

► Information about Schedule O (Form 8865) and its separate instructions is at www.irs.gov/form8865.

2016

Part I Transfers Reportable Under Section 6038B Type of Date of Transfer Information Required To Be Reported (see instructions): Part II Transfers Reportable Under Section 6038B Type of Date of Transfer Information Required To Be Reported (see instructions): Part II Dispositions Reportable Under Section 6038B	JMINA FOUNDATION	FOR EDUCATION,	INC.				35-18	13228	
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