990-T

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

OMB No. 1545-0687

2018

		For cale	ndar year 2018 or other tax ye			2018, and ending	, 20	. •	
1,2000,2000,000,000,000	ent of the Treasury evenue Service	▶ Do r	▶ Go to www.irs.gov/F not enter SSN numbers on the						en to Public Inspection for (c)(3) Organizations Only
A Cl	heck box if ddress changed		Name of organization (Check box if name cha	nged ar	nd see instructions.)			r identification number
	ot under section	Dist	LUMINA FOUNDATION F	OR EDUCATION, IN	NC.		(E	mployee	es' trust, see instructions.)
✓ 501	(C)(3)	Print	Number, street, and room or	suite no. If a P.O. box,	see ins	tructions.		3	35-1813228
408	3(e) 220(e)	Type	30 S MERIDIAN ST, SUIT	E 700					business activity code
408	3A 530(a)		City or town, state or province	e, country, and ZIP or	foreign	postal code	(5	ee instr	uctions.)
529			INDIANAPOLIS, IN 46204						523100
C Book y	value of all assets	F Gr	oup exemption number	(See instructions.))				
	1,202,918,515		neck organization type				rust 2401	(a) tru	st Other trust
			organization's unrelated t						or first) unrelated
			ALTERNATIVE INVE						
		•	at the end of the previou	is sentence, com	plete	Parts I and II, co	mplete a Sched	lule M	for each additional
			omplete Parts III-V.						
			e corporation a subsidiary	•	•		controlled group		► ☐ Yes ☑ No
			and identifying number of	<u> </u>	oratio				(0.17) 07.1 7000
	_		JULIE K. SHEWMAKE				one number ►		(317) 951-5300
Part			e or Business Incom	е		(A) Income	(B) Expense	98	(C) Net
_	Gross receipts			Delenes N					
	Less returns and			c Balance ►	1c	0			
	_	-	Schedule A, line 7)	,	2	0			
	•		t line 2 from line 1c		3	0			0
			ne (attach Schedule D)		4a	4,200,071			4,200,071
		•	4797, Part II, line 17) (atta		4b	0			0
	•		n for trusts		4c	_			
		_	tnership or an S corporation		5	(3,485,602)	0		(3,485,602)
	Rent income (6 7	0	0	+	0
			ced income (Schedule E)		-	0	0		0
		-	and rents from a controlled org			0		-	
			ction 501(c)(7), (9), or (17) organ		9	0	0		0
			ivity income (Schedule I)		10 11	0	0		0
			Schedule J)		12	0			0
	Total. Combir			1	13	714,469	0		714,469
Part			Taken Elsewhere (Se	o inetructions for	$\overline{}$				
rart			be directly connected				ions.) (Except i	or cor	itributions,
14			cers, directors, and trust			•		14	27,459
				,				15	44,656
			ance					16	0
								17	0
			lule) (see instructions) .					18	0
								19	66,161
			ons (See instructions for					20	0
			Form 4562)				3,871		
22	Less deprecia	tion cla	imed on Schedule A and	l elsewhere on ret	turn .	. 22a	0	22b	3,871
23	Depletion							23	192,271
			rred compensation plans					24	0
			grams					25	23,464
26	Excess exemp	ot exper	nses (Schedule I)					26	0
27	Excess reader	ship co	sts (Schedule J)					27	0
28	Other deduction	ons (att	ach schedule)					28	8,796,358
			dd lines 14 through 28					29	9,154,240
			xable income before net					30	(8,439,771)
			ating loss arising in tax yea					31	
32	Unrelated bus	iness ta	axable income. Subtract	line 31 from line 3	30 .			32	(8,439,771)

Part I	Ш То	otal Unrelated Business Taxable Income			
33	Total of	f unrelated business taxable income computed from all unrelated trades or businesses (see			
	instruct	ions)	33	(8,439,771)	
34	Amount	ts paid for disallowed fringes	34	119,490	_
		ion for net operating loss arising in tax years beginning before January 1, 2018 (see	-	,	+
		ions)	35	0	
		f unrelated business taxable income before specific deduction. Subtract line 35 from the sum			+
		33 and 34	36	(8,320,281)	
		deduction (Generally \$1,000, but see line 37 instructions for exceptions)	37	(0,320,261)	+
		ted business taxable income. Subtract line 37 from line 36. If line 37 is greater than line 36,	31	0	+
			00	(0.000.004)	
		e smaller of zero or line 36	38	(8,320,281)	
		ax Computation			
		zations Taxable as Corporations. Multiply line 38 by 21% (0.21)	39	0	
		Taxable at Trust Rates. See instructions for tax computation. Income tax on			
		ount on line 38 from: ☐ Tax rate schedule or ☐ Schedule D (Form 1041)	40		
	_	ax. See instructions	41		
		tive minimum tax (trusts only)	42		↓
		Noncompliant Facility Income. See instructions	43		—
		Add lines 41, 42, and 43 to line 39 or 40, whichever applies	44	0	
		ax and Payments			
	_	tax credit (corporations attach Form 1118; trusts attach Form 1116) . 45a			
		redits (see instructions)			
		I business credit. Attach Form 3800 (see instructions)			
		or prior year minimum tax (attach Form 8801 or 8827)			
		redits. Add lines 45a through 45d	45e	0	
		et line 45e from line 44	46	0	
		kes. Check if from: Form 4255 Form 8611 Form 8697 Form 8866 Other (attach schedule) .	47	0	
48	Total ta	ax. Add lines 46 and 47 (see instructions)	48	0	
		et 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k), line 2	49		
50a	Paymer	nts: A 2017 overpayment credited to 2018			
b	2018 es	stimated tax payments			
C	Tax dep	posited with Form 8868			
d	Foreign	organizations: Tax paid or withheld at source (see instructions) . 50d			
е	Backup	withholding (see instructions)			
		or small employer health insurance premiums (attach Form 8941) . 50f			
g	Other c	redits, adjustments, and payments: Form 2439			
	Form				
51	Total p	ayments. Add lines 50a through 50g	51	375,000	
52	Estimat	red tax penalty (see instructions). Check if Form 2220 is attached ▶ ✓	52	0	
53	Tax du	e. If line 51 is less than the total of lines 48, 49, and 52, enter amount owed	53	0	
54	Overpa	yment. If line 51 is larger than the total of lines 48, 49, and 52, enter amount overpaid.	54	375,000	
55	Enter the	amount of line 54 you want: Credited to 2019 estimated tax ▶ 250,000 Refunded ▶	55	125,000	
Part \	/I St	tatements Regarding Certain Activities and Other Information (see instructions)			
56	At any t	time during the 2018 calendar year, did the organization have an interest in or a signature or ot	her auth	nority Yes	No
		financial account (bank, securities, or other) in a foreign country? If "Yes," the organization ma			
	FinCEN	Form 114, Report of Foreign Bank and Financial Accounts. If "Yes," enter the name of the for	reign co	untry	
	here ▶				✓
57	During tl	he tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a fore	eign trust	? .	✓
	-	" see instructions for other forms the organization may have to file.	-		
		ne amount of tax-exempt interest received or accrued during the tax year ▶ \$	4	1,709	
_	Under	penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the bes	st of my kn	owledge and be	lief, it is
Sign	true, co	prrect, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.	May the	IRS discuss this	return
Here		CEO	with the	preparer shown	below
		are of officer Date Title	(see instru	uctions)? √Yes	□140
Paid	<u>'</u>	Print/Type preparer's name Preparer's signature Date Ch	eck i	_f PTIN	
	2464	NICOLE M BENCIK 2018			3195
Prepa	I		n's EIN ▶	35-09216	80
Use (חוע		one no.	(317) 569-8	

(Rev. January 2019)

Department of the Treasury Internal Revenue Service

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

File a separate application for each return. ► Go to www.irs.gov/Form8868 for the latest information. OMB No. 1545-1709

Electronic filing (e-file). You can electronically file Form 8868 to request a 6-month automatic extension of time to file any of the

forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits. Automatic 6-Month Extension of Time. Only submit original (no copies needed). All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns. Enter filer's identifying number, see instructions Name of exempt organization or other filer, see instructions. Employer identification number (EIN) or Type or LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 print Number, street, and room or suite no. If a P.O. box, see instructions. Social security number (SSN) File by the 30 S MERIDIAN ST, SUITE 700 due date for filing your City, town or post office, state, and ZIP code. For a foreign address, see instructions. return. See INDIANAPOLIS, IN 46204 instructions 0 7 Enter the Return Code for the return that this application is for (file a separate application for each return)

Application Return Application Return Is For Code Is For Code Form 990 or Form 990-EZ Form 990-T (corporation) 01 07 Form 990-BL 02 Form 1041-A 08 Form 4720 (individual) Form 4720 (other than individual) 09 03 Form 990-PF 04 Form 5227 10 Form 990-T (sec. 401(a) or 408(a) trust) 05 Form 6069 11 Form 990-T (trust other than above) 06 Form 8870 12

• The	books are in the care	of ► JULIE K. SHEWMAKE	R			
Tele	phone No. ►	(317) 951-5300	Fax No. ▶			
• If th	e organization does n	ot have an office or place	of business in the United States, chec	k this box		. ▶□
• If th	is is for a Group Retu	rn, enter the organization's	four digit Group Exemption Number	(GEN)	. If this	is
for the	e whole group, check	this box ▶ ☐ INs of all members the ext	. If it is for part of the group, check th	is box ▶ [and atta	ach
1		ned above. The extension	ime until 11/15, 20 19 is for the organization's return for:	, to file the exempt org	anization r	eturn for
	► □ tax year begin	ning	, 20, and ending		, 20	
2	If the tax year entered ☐ Change in accou		12 months, check reason: Initial re	eturn		
3a		for Forms 990-BL, 990-Foredits. See instructions.	PF, 990-T, 4720, or 6069, enter the to	entative tax, less	\$	200,000
b			-T, 4720, or 6069, enter any refundation year overpayment allowed as a cre		\$	375,000
С			Include your payment with this form System). See instructions.	n, if required, by	\$	O

Cat. No. 27916D

Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-EO and Form 8879-EO for payment

instructions.

Form 990-T (2018)							F	Page 3
Schedule A-Cost of C	Goods Sold. Er	nter method of in	ventory v	aluation >				
1 Inventory at beginn	The state of the s	1 0	1 1	THE CONTRACT OF THE CONTRACT O	at end of year	6	0	
		2 0	7	The state of the s	goods sold. Subtract			
3 Cost of labor	2-0" 15/10 BOSE 90 -	3 0			line 5. Enter here and			
4a Additional section	263A costs	0	8 3	in Part I, lin	ne 2	7	0	
(attach schedule)		4a 0	8	Do the rul	es of section 263A (with	th respect to	Yes	No
b Other costs (attach	schedule)	4b 0			roduced or acquired for			
5 Total. Add lines 1 t		5 0		to the orga	nization?			1
Schedule C-Rent Inc		al Property and	Persona	Property I	Leased With Real Pro	perty)	150 - 100	
(see instructions)	3.							
1. Description of property								
(1)								
(2)								-
(3)								
(4)								
V.7	2. Rent receiv	ed or accrued						
(a) From personal property (if the for personal property is more	than 10% but not	(b) From real ar percentage of rent	for personal p	roperty exceeds	3(a) Deductions directly in columns 2(a) and			ıe
more than 509	%)	50% or if the rent	is based on p	rofit or income)				
(1)								
(2)								
(3)								
(4)								
Total	0	Total			0 (1)			
(c) Total income. Add totals	of columns 2(a) an	d 2(b). Enter			(b) Total deductions. Enter here and on page	1.		
here and on page 1, Part I, lin					0 Part I, line 6, column (B)	•		0
Schedule E-Unrelate			instruction	s)	,			
		•	2. Gross in	ncome from or	3. Deductions directly con		ocable to	5
1. Description	of debt-financed prop	perty	allocable to	debt-financed	(a) Straight line depreciation	ced property (b) Other de	duction	e
			pn	operty	(attach schedule)	(attach sc		3
(1)								
(2)								
(3)								
(4)								
 Amount of average acquisition debt on or allocable to debt-financed property (attach schedule) 	of or debt-fin	e adjusted basis allocable to anced property ch schedule)	4 0	Column fivided olumn 5	7. Gross income reportable (column 2 × column 6)	8. Allocable of (column 6 × tota 3(a) and	al of colu	
(1)				%				
(2)				%				
(3)				%				
(4)				%				-
•	<u> </u>		1		Enter here and on page 1, Part I, line 7, column (A).	Enter here and Part I, line 7,		
Totals				▶	0			0
Total dividends-received de	eductions included	in column 8				•		0

Sch	edule F-Interest, Ann	uities, Roy	alties, ar	nd Rent	ts From	Controlled Org	anizations (se	e instru	ctions)	
-			E	Exempt (Controlled	Organizations	190		100	
	Name of controlled organization	2. Emploidentification	number 3.		ated income nstructions)	4. Total of specified payments made	5. Part of colum included in the corganization's gro	controlling	conne	eductions directly ected with income in column 5
(1)		2.0	8				3		0	
(2)		13	19						19	
(3)		ů.	12		-				89	
(4)					-					
None	exempt Controlled Organi	zations								
							10. Part of colum	on O that is	11 D	eductions directly
	7. Taxable Income	100 B A CO C A C A C A C A C A C A C A C A C	nrelated incor ee instruction			otal of specified yments made	included in the organization's gro	controlling	connec	cted with income in column 10
(1)										
(2)										
(3)										
(4)										
.,							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).
Total	•						•		0	0
	edule G-Investment	Income of	a Sectio	n 501(c	:)(7) (9)	or (17) Organi	zation (see inst			0
0011	1. Description of income		Amount of in		3. direc	Deductions ctly connected ach schedule)	4. Set-aside (attach sched	s	5. To and so	otal deductions et-asides (col. 3 olus col. 4)
(1)										
(2)										
(3)										
(4)										
Total	•		here and or I, line 9, col						Enter her Part I, lir	re and on page 1, ne 9, column (B).
	edule I—Exploited Exc	ompt Activ	ity Incon			Advertising In	come (see inst	ructions	٠,	0
Som	Description of exploited activ	rity bus	2. Gross unrelated iness income om trade or business	3. E d conne prod un	ected with luction of related ess 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	6. Exp	penses stable to simn 5	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1)										
(1)										
(3)										
(4)		pa	er here and or age 1, Part I, e 10, col. (A).	page line 1	nere and on e 1, Part I, 0, col. (B).					Enter here and on page 1, Part II, line 26.
Total		🏲		0	0					0
	edule J-Advertising				<u> </u>					
Pai	t I Income From F	eriodicals	Reporte	ed on a	Consoli					
	1. Name of periodical	a	2. Gross advertising income		Direct ising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income		dership osts	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)										
(2)										
(3)										
(4)										
	s (carry to Part II, line (5))	•		0	0	0				0

Page 4

Form 990-T (2018)

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.) 4. Advertising 7. Excess readership gain or (loss) (col. 2. Gross costs (column 6 3. Direct 5. Circulation 6. Readership 1. Name of periodical advertising 2 minus col. 3). If minus column 5, but advertising costs income costs not more than income a gain, compute cols. 5 through 7. column 4). (1) (2) (3) (4) Totals from Part I 0 0 0 Enter here and on Enter here and on Enter here and page 1, Part I, line 11, col. (A). page 1, Part I, line 11, col. (B). on page 1, Part II, line 27. Totals, Part II (lines 1-5) 0

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

1. Name	2. Title	3. Percent of time devoted to business	Compensation attributable to unrelated business
(1) OFFICERS		100 %	27,459
(2)		%	
(3)		%	
(4)		%	
Total. Enter here and on page 1, Part II, line 14		🕨	27,459

Form **990-T** (2018)

Page 5

Name of Partnership	EIN	UBI
INVESTMENTS		
(1) ABRAMS CAPITAL PARTNERS II, LP	04-3455023	-171,780
(2) AG REALTY FUND IX, LP	47-1483532	-235,217
(3) ALPINE INVESTORS V, LP	46-3847907	939,985
(4) ARCHLIGHT ENERGY PARTNERS FUND IV LP	20-8419824	256,532
(5) BAUPOST VALUE PARTNERS, L.PIV	26-2208448	-128,015
(6) CARMEL PARTNERS INVESTMENT FUND IV, LP	90-0781000	-34
(7) CENTRE LANE PARTNERS III, LP	45-3947315	926
(8) CHARLESBANK EQUITY FUND IX, LP	35-2600984	-79,396
(9) CHARLESBANK EQUITY FUND VII, LP	32-0280123	154,344
(10) CHARLESBANK EQUITY FUND VIII, LP	47-1109521	-18,130
(11) ENERGY SPECTRUM PARTNERS VII LP	47-1453458	-2,151,369
(12) H.I.G. BAYSIDE II AIV, LP (SERIES A)	27-2566792	9,837
(13) HIGHFIELDS CAPITAL IV LP	11-3841276	-393
(14) IRON POINT REAL ESTATE PARTNERS II	45-2465294	-58,279
(15) IRON POINT REAL ESTATE PARTNERS III, LP	35-2508362	-126,871
(16) KUEMPER HOLDINGS V, LLC	38-4011856	110,537
(17) LASALLE PROPERTY FUND GP	27-1227767	6,817
(18) LIME ROCK PARTNERS IV AF LP	98-1422853	220,568
(19) LIME ROCK PARTNERS VI, L. P.	98-1027307	-215,663
(20) MERCED PARTNERS IV, L.P.	36-4756959	12,798
(21) MERCED PARTNERS V, L.P.	81-2715734	355,779
(22) MERCED SHIPPING PARTNERS LP	46-4629442	1,880
(23) NATURAL GAS PARTNERS IX, LP	26-0632609	2,478
(24) OCM REAL ESTATE OPPORTUNITIES FUND III, LP	01-0709496	-1,205
(25) PARTNERS FOR GROWTH V LP	82-1077490	138,161
(26) RETHINK EDUCATION, LP	37-1689659	-2,149
(27) RIVA CAPITAL PARTNERS IV, LP	36-4804829	17,233
(28) SILVER CREEK MIDSTREAM COINVEST LP	82-4933234	-2,407,524
(29) STARWOOD CAPTIAL HOSPITALITY FUND I-3, LP	98-0459282	-2,866
(30) STONEHILL INSTITUTIONAL PARTNERS LP	13-3982121	-64,738
(31) STONELAKE OPPORTUNITY PARTNERS III, LP	80-0878134	-105,554
(32) TAILWATER E&P OPPORTUNITY FUND II, LP	47-4098699	3,912,181
(33) TAILWATER ENERGY FUND III, L.P.	81-5391776	-3,794,670
(34) VENTURE INVESTMENT ASSOCIATES VI, LP	20-5196244	21,333
(35) WALTON STREET REAL ESTATE FUND V, LP	20-3719884	-9,573
(36) WHITMAN/PETERSON PARTNERS III LP	81-4500195	-73,565
	Total for Part I, Line 5	-3,485,602

Form 990T Part II, Line 19

Taxes and Licenses

Description	04	Amount
INVESTMENTS		
(1) CHARLESBANK EQUITY FUND IX, LP 352600984 - FOREIGN TAX EXPENSE		2,162
(2) STATE UBI TAX		63,999
	Total	66,161
	Total for Part II, Line 19	66,161

Form 990T Part II, Line 20

Charitable Contributions

Year Generated	Amount Generated	Amount Used in Prior Years	Amount Used in Current Year	Amount Converted to NOL	Amount Remaining	Contribution Carryover Expires
2015	1,243	0			1,243	2020
2016	1,568	0			1,568	2021
2017	2,341	0			2,341	2022
2018	5,086	0			5,086	2023
Totals	10,238	0	0	0	10,238	0

Form 990T Part II, Line 28

Other Deductions

Description	Amount
INVESTMENTS	
(1) ABRAMS CAPITAL PARTNERS II, LP 043455023	825
(2) ALPINE INVESTORS V, LP 463847907	562,016
(3) ARCHLIGHT ENERGY PARTNERS FUND IV LP 208419824	44,263
(4) BAUPOST VALUE PARTNERS, L.PIV 262208448	54,760
(5) CHARLESBANK EQUITY FUND IX, LP 352600984	269,913
(6) CHARLESBANK EQUITY FUND VII, LP 320280123	21,244
(7) CHARLESBANK EQUITY FUND VIII, LP 471109521	19,162
(8) H.I.G. BAYSIDE II AIV, LP (SERIES A) 272566792	48
(9) H.I.G. EUROPE CAPITAL PARTNERS, L.P. 980533386	890
(10) IRON POINT REAL ESTATE PARTNERS II 452465294	2,780
(11) IRON POINT REAL ESTATE PARTNERS III, LP 352508362	11,335
(12) LIME ROCK PARTNERS IV AF LP 981422853	313,495
(13) LIME ROCK PARTNERS VI, L. P. 981027307	198,002
(14) MERCED PARTNERS IV, L.P. 364756959	3,767
(15) MERCED PARTNERS V, L.P. 812715734	1,220,174
(16) MERCED SHIPPING PARTNERS LP 464629442	1,243
(17) NATURAL GAS PARTNERS IX, LP 260632609	2,626
(18) STONELAKE OPPORTUNITY PARTNERS III, LP 800878134	40,338
(19) TAILWATER E&P OPPORTUNITY FUND II, LP 474098699	5,495,611
(20) TAILWATER ENERGY FUND III, L.P. 815391776	34,138
(21) VENTURE INVESTMENT ASSOCIATES VI, LP 205196244	26,233
(22) LEGAL FEES	14,767
(23) ACCOUNTING FEES	45,580
(24) CONSULTING/OTHER PROFESSIONAL FEES	398,956
(25) OCCUPANCY	6,986
(26) TRAVEL	2,231
(27) OTHER MISCELLANEOUS EXPENSE	4,975
Total	8,796,358
Total for All Activities	8,796,358

Form 990T Part II, Line 31 -Summary

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

Year Generated	Amount Generated	Converted Contributions	Amount Used in Prior Years	Amount Used in Current Year	Amount Remaining
2018	8,320,281				8,320,281
Totals	8,320,281	0	0	0	8,320,281

Form 990T Part III, Line 35

Deduction for net operating loss arising in tax years beginning before January 1, 2018

Year Generated	Amount Generated	Converted Contributions	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
2017	2,240,598	·			2,240,598	2037
Totals	6,543,871	0	0	0	6,543,871	

-orm	aan	I Dart \	/	ne 50b	
	330	I Fait	ν. Ц	HE JUD	

Estimated Tax Payments

Date	Amount
05/15/2018	50,000
06/15/2018	25,000
09/15/2018	25,000
12/15/2018	25,000
Totals	125,000

SCHEDULE D (Form 1120)

Department of the Treasury Internal Revenue Service

Capital Gains and Losses

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

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

OMB No. 1545-0123

2018

Employer identification number

LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 Part I Short-Term Capital Gains and Losses (See instructions.) See instructions for how to figure the amounts to enter on (g) Adjustments to gain (h) Gain or (loss) the lines below. or loss from Form(s) Subtract column (e) from **Proceeds** Cost 8949, Part I, line 2, column (d) and combine This form may be easier to complete if you round off cents to (sales price) (or other basis) column (g) the result with column (g) 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 20,915 0 0 with **Box C** checked 20.915 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 Unused capital loss carryover (attach computation) 6 0) 7 Net short-term capital gain or (loss). Combine lines 1a through 6 in column h 7 20,915 Part II Long-Term Capital Gains and Losses (See instructions.) See instructions for how to figure the amounts to enter on (g) Adjustments to gain (h) Gain or (loss) the lines below. or loss from Form(s) Subtract column (e) from **Proceeds** Cost 8949, Part II, line 2, column (d) and combine This form may be easier to complete if you round off cents to (sales price) (or other basis) the result with column (g) 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, leave this line blank and go to line 8b . 0 8b Totals for all transactions reported on Form(s) 8949 with **Box D** checked 0 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 1,933,667 with Box F checked 0 0 1,933,667 11 Enter gain from Form 4797, line 7 or 9. 11 2.245.489 Long-term capital gain from installment sales from Form 6252, line 26 or 37 12 Long-term capital gain or (loss) from like-kind exchanges from Form 8824 13 Capital gain distributions (see instructions) 14 15 Net long-term capital gain or (loss). Combine lines 8a through 14 in column h 15 4,179,156 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 20,915 17 Net capital gain. Enter excess of net long-term capital gain (line 15) over net short-term capital loss (line 7) 17 4,179,156 18 Add lines 16 and 17. Enter here and on Form 1120, page 1, line 8, or the proper line on other returns . 18 4,200,071 Note: If losses exceed gains, see Capital losses in the instructions.

Underpayment of Estimated Tax by Corporations

Note: Generally, the corporation is not required to file Form 2220 (see Part II below for exceptions) because the IRS will figure any penalty

► Attach to the corporation's tax return.

OMB No. 1545-0123

Internal Revenue Service

LUMINA FOUNDATION FOR EDUCATION, INC.

Department of the Treasury ▶ Go to www.irs.gov/Form2220 for instructions and the latest information.

	and bill the corporation. However, the corporation may still use Form the estimated tax penalty line of the corporation's income tax return,			A CONTRACTOR OF THE PROPERTY O	r the amount fr	om page 2, line
Par	Required Annual Payment				520 87	
1	Total tax (see instructions)			process s	1	0
2a	Personal holding company tax (Schedule PH (Form 1120), line 26) include	led on	line 1 2a			
b	Look-back interest included on line 1 under section 460(b)(2) for complete contracts or section 167(g) for depreciation under the income forecast management.		•			
C	Credit for federal tax paid on fuels (see instructions)		2c			
d	Total. Add lines 2a through 2c				2d	0
3	Subtract line 2d from line 1. If the result is less than \$500, do not coldoes not owe the penalty		or file this form	n. The corporation	on 3	0
4	Enter the tax shown on the corporation's 2017 income tax return. See in	structi	ons. Caution: It	the tax is zero	or	
	the tax year was for less than 12 months, skip this line and enter the	amo	unt from line 3	on line 5	4	0
5	Required annual payment. Enter the smaller of line 3 or line 4. If the co	orpora	tion is required	o skip line 4, ent	er	
	the amount from line 3			•	5	0
Part		ly. If	any boxes ar		e corporation	n must file
6	☐ The corporation is using the adjusted seasonal installment method.					
7	☐ The corporation is using the annualized income installment method.					
8	✓ The corporation is a "large corporation" figuring its first required install.	allment	t based on the p	rior year's tax.		
Part	Figuring the Underpayment					
			(a)	(b)	(c)	(d)
9	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	04/15/2018	06/15/2018	09/15/2018	12/15/2018
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 above in each column	10	0	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				
	Complete lines 12 through 18 of one column before going to the next column.	<u></u>				
12	Enter amount, if any, from line 18 of the preceding column	12		0	0	0
13	Add lines 11 and 12	13		0	0	0
14	Add amounts on lines 16 and 17 of the preceding column	14		0	0	0
15	Subtract line 14 from line 13. If zero or less, enter -0	15	0	0	0	0
16	If the amount on line 15 is zero, subtract line 13 from line 14. Otherwise, enter -0	16		0	0	
17	Underpayment. If line 15 is less than or equal to line 10, subtract line 15 from line 10. Then go to line 12 of the next column. Otherwise, go to line 18	17	0	0	0	0
18	Overpayment. If line 10 is less than line 15, subtract line 10 from line 15. Then go to line 12 of the next column	18	0	0	0	

Form 2220 (2018) Page 2

Part	V Figuring the Penalty									276	3
	Ligaring the Formaty		(a)	T	(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									
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 4/15/2018 and before 7/1/2018	21	0	55	0	- 9	0	,	5	0	
22	Underpayment on line 17 \times Number of days on line 21 \times 5% (0.05)	22	\$	0	\$	0	\$	0	\$		0
23	Number of days on line 20 after 6/30/2018 and before 10/1/2018	23	0		0		0			0	
24	Underpayment on line 17 \times Number of days on line 23 \times 5% (0.05)	24	\$	0	\$	0	\$	0	\$		0
25	Number of days on line 20 after 9/30/2018 and before 1/1/2019	25	0		0		0			0	
26	Underpayment on line 17 \times Number of days on line 25 \times 5% (0.05)	26	\$	0	\$	0	\$	0	\$		0
27	Number of days on line 20 after 12/31/2018 and before 4/1/2019	27	0		0		0			0	
28	Underpayment on line 17 \times Number of days on line 27 \times 6% (0.06)	28	\$	0	\$	0	\$	0	\$		0
29	Number of days on line 20 after 3/31/2019 and before 7/1/2019	29	0		0		0			0	
30	Underpayment on line 17 \times Number of days on line 29 \times *%	30	\$	0	\$	0	\$	0	\$		0
31	Number of days on line 20 after 6/30/2019 and before 10/1/2019	31	0		0		0			0	
32	Underpayment on line 17 \times Number of days on line 31 \times *%	32	\$	0	\$	0	\$	0	\$		0
33	Number of days on line 20 after 9/30/2019 and before 1/1/2020	33	0		0		0			0	
34	Underpayment on line 17 \times Number of days on line 33 \times *%	34	\$	0	\$	0	\$	0	\$		0
35	Number of days on line 20 after 12/31/2019 and before 3/16/2020	35	0		0		0			0	
36	Underpayment on line 17 \times Number of days on line 35 \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 a line for other income tax returns				•		•	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.

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

Form 1120S filers: For lines 1, 2, 3, and 21 "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 3 months	First 5 months	First 8 months	First 11 months
a	Tax year beginning in 2015	1a				
b	Tax year beginning in 2016	1b			5	
C	Tax year beginning in 2017	1c				
2	Enter taxable income for each period for the tax year beginning in	1	2	2	2	2
	2018. 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 2015	3a				
b	Tax year beginning in 2016	3b				
C	Tax year beginning in 2017	3c				
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					
7	Add lines 4 through 6	6 7				
8	Divide line 7 by 3.0	8				
9a	Divide line 2 by line 8	9a				
b	Extraordinary items (see instructions)	9b				
C	Add lines 9a and 9b	9c				
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				
c	Divide the amount in columns (a) through (c) on line 3c by the					
	amount in column (d) on line 3c	11c				
12	Add lines 11a through 11c	12				
13	Divide line 12 by 3.0	13				
	Mallista the assessment to extreme (a) there is (a) of the color					
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				
	(-)	-1-				
15	Enter any alternative minimum tax for each payment period. See					
-	instructions	15				
16	Enter any other taxes for each payment period. See instructions	16				
17	Add lines 14 through 16	17				
18	For each period, enter the same type of credits as allowed on					
	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 (2018) Page **4**

Part	Annualized Income Installment Method		(-)	0.)	(-)	(40
			(a)	(b)	(c)	(d)
	A DESCRIPTION OF THE PROPERTY.		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				
	A STATE OF THE STA					
23a	Annualized taxable income. Multiply line 21 by line 22	23a	5	5	5	jt
c	Extraordinary items (see instructions)	23b 23c				8
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				
	Required Installments				I	
	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.					
	smaller of the amounts in each column from line 19 of 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				
		50				
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 **8949**

Department of the Treasury

Internal Revenue Service

Sales and Other Dispositions of Capital Assets

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

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

OMB No. 1545-0074

2018
Attachment
Sequence No. 12A

Name(s) shown on return
LUMINA FOUNDATION FOR EDUCATION, INC.

Social security number or taxpayer identification number 35-1813228

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

Part I

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

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

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

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

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

✓ (C) Short-term transactions	not reported	to you on F	orm 1099-B				
(a) Description of property	(b) Date acquired	(c) Date sold or	Proceeds	(e) Cost or other basis. See the Note below	Adjustment, if If you enter an enter a co See the sep	(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	parate (f) (g)		from column (d) and combine the result with column (g)
SHORT-TERM GAIN/LOSS FROM INVESTMENTS			20,915				20,915
2 Totals. Add the amounts in columns negative amounts). Enter each total Schedule D, line 1b (if Box A above above is checked), or line 3 (if Box A)	al here and inc is checked), lir	lude on your le 2 (if Box B	20.915	0		0	20.915

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 (2018) 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.

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 generally long-term (see instructions). For short-term transactions, see page 1.

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

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

☐ (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above)
☐ (E) Long-term transactions reported on Form(s) 1099-B showing basis wasn't reported to the IRS
✓ (F) Long-term transactions not reported to you on Form 1099-B

(a) Description of property (Example: 100 sh. XYZ Co.)	(b) Date acquired (Mo., day, yr.)	(c) Date sold or disposed of (Mo., day, yr.)	(d) Proceeds (sales price) (see instructions)	(e) Cost or other basis. See the Note below and see <i>Column</i> (e) in the separate instructions	If you enter an enter a c See the sep	f any, to gain or loss. amount in column (g), ode in column (f). parate instructions. (g) Amount of	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
				nioti dottorio	instructions	adjustment	With Column (g)
LONG-TERM GAIN/LOSS							
FROM INVESTMENTS			1,933,667				1,933,667
2 Totals. Add the amounts in columns negative amounts). Enter each total Schedule D, line 8b (if Box D above above is checked), or line 10 (if Box D above is checked).	al here and inc is checked), lir F above is che	lude on your ne 9 (if Box E	1,933,667	0		0	1,933,667

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

Form 4797

Department of the Treasury

LUMINA FOUNDATION FOR EDUCATION, INC.

Internal Revenue Service
Name(s) shown on return

Sales of Business Property

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

Attach to your tax return.

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

OMB No. 1545-0184

2018

Attachment Sequence No. 27

35-1813228

Identifying number

1	Enter the gross proceeds substitute statement) that			-	50.5	0.5	1	
Pa	Sales or Exchan	ges of Proper	ty Used in a T	rade or Busines	ss and Involunta	ary Conver		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 or basis, plu improvement expense of	s and	(g) Gain or (loss) Subtract (f) from the sum of (d) and (e)
1231	GAIN OR LOSS FROM PASSTHROUGH			2,245,489				2,245,489
3	Gain, if any, from Form 4684	1 line 30					3	
4	Section 1231 gain from insta						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	2,245,489
	Partnerships and S corpoline 10, or Form 1120S, Sch	rations. Report th	he gain or (loss) fo	ollowing the instruction			-	
	Individuals, partners, S co line 7 on line 11 below and losses, or they were recap Schedule D filed with your n	d skip lines 8 and tured in an earlier	 If line 7 is a ga r year, enter the g 	ain and you didn't h gain from line 7 as	ave any prior year s	section 1231		
8	Nonrecaptured net section	1231 losses from p	orior years. See ins	structions			8	
9	Subtract line 8 from line 7. If 9 is more than zero, enter							
	capital gain on the Schedule						9	2,245,489
	rt II Ordinary Gains a							
10	Ordinary gains and losses n	ot included on line	s 11 through 16 (II	nclude property held	1 year or less):	1		
44	Lass if any frame line 7							1
11	Loss, if any, from line 7.						11	
12 13	Gain, if any, from line 7 or a Gain, if any, from line 31						13	0
14	Net gain or (loss) from Form						14	
15	Ordinary gain from installme						15	
16	Ordinary gain or (loss) from						16	
17	Combine lines 10 through 1	_					17	0
	For all except individual retu and b below. For individual	urns, enter the amo	ount from line 17 o	on the appropriate lin				
•	a If the loss on line 11 includes from income-producing prop	a loss from Form	4684, line 35, colu	mn (b)(ii), enter that pa				
	employee.) Identify as from "F	-					18a	
	Redetermine the gain or (loss)					1040), line 14	18b	

19	(a) Description of section 1245, 1250, 1252, 1254, or 1255	5 prope	erty:			(b) Date acq (mo., day,		(c) Date sold (mo., day, yr.)
Α							-	
В								
С							-	
D	11						- 1	
		4020	Property A	Property	B	Property	C	Property D
2020	These columns relate to the properties on lines 19A through 19D	57875				A STATE OF THE STA		
20	Gross sales price (Note: See line 1 before completing.) .	20				-		
21	Cost or other basis plus expense of sale	21						
22	Depreciation (or depletion) allowed or allowable	22						
23	Adjusted basis. Subtract line 22 from line 21	23						
24	Total gain. Subtract line 23 from line 20	24						
25	If section 1245 property:	24						
	Depreciation allowed or allowable from line 22	25a						
	Enter the smaller of line 24 or 25a	25b						
26	If section 1250 property: If straight line depreciation was used,	200						
20	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	200						
b	24 or line 26a. See instructions	26b						
c	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						
f	Section 291 amount (corporations only)	26f						
	Add lines 26b, 26e, and 26f	26g						
27	If section 1252 property: Skip this section if you didn't							
	dispose of farmland or if this form is being completed for							
	a partnership.							
а	Soil, water, and land clearing expenses	27a						
b	Line 27a multiplied by applicable percentage. See instructions	27b						
C	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:							
а	Applicable percentage of payments excluded from							
	income under section 126. See instructions	29a						
	Enter the smaller of line 24 or 29a. See instructions .	29b		- L. II			- 00	
Sun	nmary of Part III Gains. Complete property colun	nns A	through D throug	ine 29b i	oetore	e going to iir	1e 30.	
00	Total asias for all associates Add associate actions Address	b	line 04				-	
30	Total gains for all properties. Add property columns A thro			 d on line 10			30	
31	Add property columns A through D, lines 25b, 26g, 27c, 26						31	,
32	Subtract line 31 from line 30. Enter the portion from casu other than casualty or theft on Form 4797, line 6	-	their on Form 4664			-	32	
Par	IV Recapture Amounts Under Sections 17							
	(see instructions)					(a) Section	on	(b) Section
						179		280F(b)(2)
33	Section 179 expense deduction or depreciation allowable		•		33			
34	Recomputed depreciation. See instructions				34			
35	Recapture amount. Subtract line 34 from line 33. See the i	nstruct	ions for where to re	port	35		0	

Form 4562

Department of the Treasury

Internal Revenue Service (99)

Depreciation and Amortization

(Including Information on Listed Property)

►Attach toy our taxreturn.

▶Gotowww.irs.gov/Form4562 for instructions and the latest information.

OMB No. 1545-0172

2018
Attachment
Sequence No. 179

Name(s) shown on return Business or activity to which this form relates Identifying number LUMINA FOUNDATION FOR EDUCATION, INC. 523100 35-1813228 Part I Election To Expense Certain Property Under Section 179 Note: If you have any listed property, complete Part V before you complete Part I. 510,000 2 Total cost of section 179 property placed in service (see instructions) 2 0 3 Threshold cost of section 179 property before reduction in limitation (see instructions) . 510,000 4 0 5 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing 5 510,000 (a) Description of property (b) Cost (business use only) 6 (c) Elected cost 0 8 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 8 0 9 Tentative deduction. Enter the smaller of line 5 or line 8 0 9 10 Carryover of disallowed deduction from line 13 of your 2017 Form 4562 10 0 0 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions. 11 12 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11. 12 0 13 Carryover of disallowed deduction to 2019. Add lines 9 and 10, less line 12 Note: Don't use Part II or Part III below for listed property. Instead, use Part V. Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) 14 Special depreciation allowance for qualified property (other than listed property) placed in service 14 0 15 0 16 Other depreciation (including ACRS) 16 0 Part III MACRS Depreciation (Don't include listed property. See instructions.) **Section A** 17 MACRS deductions for assets placed in service in tax years beginning before 2018 17 3,871 18 If you are electing to group any assets placed in service during the tax year into one or more general Section B-Assets Placed in Service During 2018 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (a) Classification of property placed in service (e) Convention (f) Method (a) Depreciation deduction (business/investment use period only—see instructions) **19a** 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property **f** 20-year property g 25-year property 25 yrs. S/L h Residential rental S/L 27.5 yrs. MM property 27.5 yrs. MM S/L S/L i Nonresidential real 39 yrs. MM MM S/L Section C-Assets Placed in Service During 2018 Tax Year Using the Alternative Depreciation System 20a Class life S/L **b** 12-year 12 yrs. S/L c 30-year 30 yrs. MM S/L d 40-year MM 40 yrs. Part IV Summary (See instructions.) 21 0 22 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter here and on the appropriate lines of your return. Partnerships and S corporations—see instructions 22 3,871 23 For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs 23 0

	4562 (2018)																Page Z
Pa		d Proper tainment, i		lude auto n, or amu			ertain	other	vehicl	les,	certa	ain a	ircraft	, and	prop	erty us	ed for
		For any ve				-			_				lease	expens	e, con	iplete oi	nly 24a,
	Section A	A-Depreci	ation an	d Other In	formati	on (Ca	ution:	See the	instru	ction	s for	limits	for pas	senge	auton	nobiles.)	C)
248	Do you have e							-								Yes	
o .	(a)	(b)	(c)			25 25	(e)	68 60	(f)		(g)			(h)		(i)	
	e of property (list vehicles first)		Business/ investment u percentage	ise Cost or o	d) ther basis		for depre ness/inve- use only	stment	Recove		Meth	od/		oreciation eduction	E	elected sec	
25	Special dep											25			0		
26	Property us	ed more tha	an 50% ir	a qualifie	d busine	ess use) :	795		30					100		
(6)		i i		%						0					1		
				%													
				%													
27	Property us	ed 50% or	less in a	qualified bu	ısiness	use:											
				%						S	3/L –						
				%						S	S/L –						
				%						S	S/L –						
28	Add amoun	ts in columi	n (h), lines	s 25 throug	h 27. E	nter he	re and	on line	21, pag	ge 1		28			0		
29	Add amoun	ts in columi	n (i), line 2	26. Enter he	ere and	on line	7, pag	e1 .							29		0
	plete this sectour employees			by a sole pr		, partne	er, or oth	her "mo	re than	5% (owner						vehicles
30	Total business/investment miles driven during the year (don't include commuting miles)				(a) (b) Vehicle 1 Vehicle 2						(d) (e) hicle 4 Vehicle 5			(f) Vehicle 6			
31 32	Total commu Total other miles driven	r personal															
33	Total miles		ing the v	 γρατ Δdd					+					+			
33	lines 30 thro			· · ·)		0		0)		0		0
34	Was the veh				Yes	No	Yes	No	Yes		lo	Yes	No	Yes	No	Yes	No
04	use during of			Sorial	103	110	103	110	103	+"		. 00	110	103	110	103	110
35	Was the vel	nicle used p	rimarily b														
36	Is another ve	hicle availabl	e for pers	onal use?													
				stions for	Emplo	vers W	ho Pro	vide V	ehicles	s for	Use	by Th	eir Em	plovee	s		
	wer these que e than 5% ov	estions to d	etermine	if you mee	t an exc	eption						_				s who ar	en't
37	Do you mai	ntain a writ	ten polic	v statemer	nt that r	rohibit	s all pe	ersonal	use of	vehi	icles.	inclu	dina co	mmuti	na. bv	Yes	No
-	your employ			•			•										✓
38	Do you mai	ntain a writ		•							•						✓
20	employees?					_	-			ciors	, or T	70 OF	more o	witers		-	1
39	Do you trea				_								· · ·			-	· •
40	Do you prouse of the v								ormatio		-	our el	прюуе	es ado	ut the		✓
41	Do you mee							-		-		inetr	 uctions			-	/
71	Note: If you																•
Pa	rt VI Amo		707,00,	00, 40, 01 -	113 10	55, UU	ii t con	ipiete t	Section	D 10	i uie	COVE	eu ven	icies.			
·	Aino	uzuuon		(1-)									(e)				
		(a) on of costs		(b) Date amortization begins	ation	Amo	(c) rtizable a	mount	(d) section		Amortiza period percent	ation l or	Amortiz	(f) zation for th	nis year
42	Amortization	n of costs tl	nat begin	s during yo	ur 2018	3 tax ye	ear (see	instruc	ctions):					I			
						-	-										
	Amortization		_	_		_								43			0
44	Total, Add	amounts in	column	f). See the	instruct	tions fo	or where	e to rer	ort					44			0

926

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

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

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

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

OMB No. 1545-0026

Attachment Sequence No. 128

Name	of transferor	Identifying number (see instructions)
	NA FOUNDATION FOR EDUCATION, INC.	35-1813228
1	12 3 1 5 5 5 6 1 4 5 7 5 7 5 7 5 5 6 5 5 5 5 5 5 5 5 5 5 5	that is not a controlled foreign corporation? . Yes No
2	If the transferor was a corporation, complete questions 2a thr	
а	If the transfer was a section 361(a) or (b) transfer, was the five or fewer domestic corporations?	transferor controlled (under section 368(c)) by
b	네 없는 일반지가 없었다. 이 시간에 가는 사람들은 사람들은 일반에 없는 사람들에서 모양하다 그래요?	
	Controlling shareholder	Identifying number
С	If the transferor was a member of an affiliated group filicorporation?	
	If not, list the name and employer identification number (EIN)	of the parent corporation.
	Name of parent corporation	EIN of parent corporation
d	Have basis adjustments under section 367(a)(4) been made?	
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	actual transferor (but is not treated as such under section 367
а	List the name and EIN of the transferor's partnership.	
	Name of partnership	EIN of partnership
AG RI	EALTY FUND IX, LP	47-1483532
b	Did the partner pick up its pro rata share of gain on the transf	er of partnership assets?
C	Is the partner disposing of its entire interest in the partnership	
d	Is the partner disposing of an interest in a limited partners	
	securities market?	
Part		· · · · · · · · · · · · · · · · · · ·
4 ^C DI	Name of transferee (foreign corporation) EALTY IX INVESTMENTS, LP	5a Identifying number, if any 98-1195882
6	Address (including country)	5b Reference ID number
199 E	BAY ST., COMMERCE CT. W. C/O 152928 CANADA INC. ONTO, ONTARIO, M5L 1B9, CANADA	
7	Country code of country of incorporation or organization (see	instructions)
CA		
8	Foreign law characterization (see instructions)	
	ACCULATION.	
CORP 9	PORATION Is the transferee foreign corporation a controlled foreign corp	oration?

Part III Infor		ding Transfer of Property	(see instruction	s)		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value date of transfe		(d) Cost or other basis	(e) Gain recognized on transfer
Cash			1,0	34,427	1 10 24 10 20	3 30 30 30 30 30 30
	the only property kip the remainder	r transferred?		* * * * *		🗹 Yes 🗌 No
Section B-Othe	r Property (other	er than intangible property so	ubject to section	367(d))		69.
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value date of transfe		(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	0					
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
12a Were any a foreign con If "Yes," go b Was the tracking of If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tracking If "No," ski	poration?	In branch (including a branch of the corporation that transferred foreign disregarded entity) to the co. If "No," skip lines 12c and 1 asfer, was the domestic corporation to the corporation that transferred in the corporation that the corporation that transferred in the corporation that the	ed substantially allow a specified 10% 12d, and go to line poration a U.S.	l of the asse -owned fore e 13. shareholder	ets of a foreign breign corporation? with respect to	ranch
Section C—Intal	igible Property	Subject to Section 307(u)				(6)
Type of property	(a) Date of transfer	(b) Description of property	Useful Arm on d	(d) 's length price late of transfer	(e) Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

14a b c d	reasonably anticipated to exceed 20 years?	☐ Yes ☐ No☐ Yes ☐ No
Supp	olemental Part III Information Required To Be Reported (see instructions)	
Part 16	Additional Information Regarding Transfer of Property (see instructions) Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before Various % (b) After Various %	
17 18 a b c d 19 20a	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351 Indicate whether any transfer reported in Part III is subject to any of the following. Gain recognition under section 904(f)(3)	 Yes
b c 21	If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions	☐ Yes ☐ No

926

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Internal Revenue Service

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OMB No. 1545-0026

Attachment Sequence No. 128

Jame o	f transferor		Identifying number (see instructions)
	IA FOUNDATION FOR EDUCATION, INC.		35-1813228
1	Is the transferee a specified 10%-owned foreign corporation	that is not a controlled fore	
2	If the transferor was a corporation, complete questions 2a thr		
a b	If the transfer was a section 361(a) or (b) transfer, was the five or fewer domestic corporations?		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?		
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?		Yes No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	actual transferor (but is r	not treated as such under section 367
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EIN	l of partnership
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
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 partners	hip that is regularly traded	
D	securities market?	· · · · · · · · · ·	Yes 🗹 No
Part		e instructions)	Foldowiń down wombon if any
4 3\/D_I\	Name of transferee (foreign corporation) / CAYMAN XIV		5a Identifying number, if any
6 PO B	Address (including country) OX 309 UGLAND HOUSE SOUTH CHURCH STREET, GE MAN, KY1-1104, CAYMAN ISLANDS	EORGETOWN, GRAND	5b Reference ID number (see instructions)
7	Country code of country of incorporation or organization (see	instructions)	1
SJ 8	Foreign law characterization (see instructions)		
	ORATION		
JURP	ORATION		

Part III Infor		ding Transfer of Property	(see instructions	s)		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value date of transfer		(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/18/2018		15	6,864	E16 (140 MO M	
If "Yes," sk		of Part III and go to Part IV.				🗹 Yes 🗌 No
Section B-Othe	r Property (other	er than intangible property s	ubject to section	367(d))		89 i
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value date of transfer		(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
12a Were any a foreign con If "Yes," go b Was the tracking of If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tracking If "No," ski	poration?	stic corporation that transferred foreign disregarded entity) to the corporation that transferred foreign disregarded entity) to the corporation?	ed substantially all a specified 10%-12d, and go to line poration a U.S. s	of the asse owned fore 13. hareholder	ets of a foreign breign corporation? with respect to	anch
Section C-Intar	gible Property	Subject to Section 367(d)			1	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful Arm's life on da	(d) s length price tte of transfer	(e) Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

14a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life
	reasonably anticipated to exceed 20 years?
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? \Box Yes \Box No
C	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section
	1.367(d)-1(c)(3)(ii) for any intangible property?
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in
	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?
	The state of the s
Supr	plemental Part III Information Required To Be Reported (see instructions)
- mpr	volume and the second control of the second
Part	Additional Information Regarding Transfer of Property (see instructions)
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
	(a) Before 0.256457 % (b) After 0.256457 %
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
18	Indicate whether any transfer reported in Part III is subject to any of the following.
а	Gain recognition under section 904(f)(3)
	Gain recognition under section 904(f)(5)(F)
b	· · · · · · · · · · · · · · · · · · ·
C	Recapture under section 1503(d)
d	Exchange gain under section 987
19	Did this transfer result from a change in entity classification?
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . Yes V No
	If "Yes," complete lines 20b and 20c.
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$
c	Did the domestic corporation not recognize gain or loss on the distribution of property because the
·	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation
	covered by section 367(e)(1)? See instructions

926

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OMB No. 1545-0026

Attachment Sequence No. 128

Vame o	f transferor	Identifying number (see instructions)
	NA FOUNDATION FOR EDUCATION, INC.	35-1813228
1	1. 2000/2013-0000 1000/1000 40 40 40 40 11 1 - Fe-18 40 200 2015-000 1000 1000 1000 1000 1000 1000 10	that is not a controlled foreign corporation? . Yes No
2	If the transferor was a corporation, complete questions 2a the	
a b	네 발한 하는데 또 선생님의 이 시간 점점 집안 하는데 이번 사람들이 얼마나 있다. 아이들이 되어 그 그는 그 가는 그리고 그리고 그린다.	
	Controlling shareholder	Identifying 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
	Here having all interests and an artist 2007/5/4) have made	No. O No.
d	Have basis adjustments under section 367(a)(4) been made?	
3	complete questions 3a through 3d.	e actual transferor (but is not treated as such under section 36)
а	List the name and EIN of the transferor's partnership.	
	Name of partnership	EIN 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	
C	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		
4	Name of transferee (foreign corporation)	5a Identifying number, if any
	HOS INST SARL	98-1127610
6 41 AV	Address (including country) ENUE DE LA GARE, L-1611, LUXEMBOURG	5b Reference ID number (see instructions)
7	Country code of country of incorporation or organization (see	instructions)
8	Foreign law characterization (see instructions)	
CORP 9	ORATION Is the transferee foreign corporation a controlled foreign corp	oration?
	IS THE TRANSFERED TOTALION COMPARATION A CONTROLLED TOTALION COM	oranon (// Vee No

Part III Infor		ding Transfer of Property	(see instructions	s)		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value of date of transfer	on	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	10/10/2018		10	9,799	110 mg, 400 mg	
If "Yes," sk		of Part III and go to Part IV.				🗹 Yes 🗌 No
Section B-Othe		er than intangible property so		367(d))	1000	
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value of date of transfer	on	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities				6.5		
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
12a Were any a foreign con If "Yes," go b Was the tracking of If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tracking If "No," ski	poration?	In branch (including a branch of the stic corporation that transferred foreign disregarded entity) to the stic. If "No," skip lines 12c and start of the stic.	ed substantially all of a specified 10%-of 12d, and go to line poration a U.S. s	of the asse owned fore 13. hareholder	its of a foreign brign corporation? with respect to	ranch
Section C-Intar	igible Property	Subject to Section 367(d)	<u> </u>		<u> </u>	
Type of property	(a) Date of transfer	(b) Description of property	Useful Arm's on da	(d) s length price te of transfer	(e) Cost or other basis	Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

14a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life	
	reasonably anticipated to exceed 20 years?	
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? \square Yes \square No	,
C	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?	,
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in	
0910	Regulations section 1.367(d)-1(c)(3)(ii) ► \$	
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	•
Supp	plemental Part III Information Required To Be Reported (see instructions)	
		_
		—
		—
		—
Part	IV Additional Information Regarding Transfer of Property (see instructions)	—
·	Additional information regarding francisc of troperty (see instructions)	—
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.	
	(a) Before 0.193548 % (b) After 0.193548 %	
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а	Gain recognition under section 904(f)(3))
b		
С	Recapture under section 1503(d)	
d		
19	Did this transfer result from a change in entity classification?	
20a		
	If "Yes," complete lines 20b and 20c.	
b		
C	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$	
•		_
	Did the domestic corporation not recognize gain or loss on the distribution of property because the	_
21)

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

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Attachment Sequence No. 128

g number (see instructions) 35-1813228 pration? . Yes No 368(c)) by Yes No Yes No
oration? .
368(c)) by Yes . No Yes . No
Yes No
Yes No
🗹 Yes 🗆 No
number
number
the parent
orporation
🗌 Yes 🗹 No
100 100 100
d as such under section 367
nership
icionip
Yes . No
⊔ Yes ⊔ No
established
⊔ Yes ⊔ No
matificians accompany if any
ntifying number, if any
orongo ID number
erence ID number
structions)
structions)
structions)
structions)

Part III Infor		ding Transfer of Property	(see instructions)		
Type of	(a)	(b)	(c)	(d)	(e)
property	Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	Gain recognized on transfer
Cash	VARIOUS	23.00 (12.00)	5,003,250	0	
	the only property kip the remainder	transferred?			🗸 Yes 🗌 No
Section B-Othe	r Property (othe	r than intangible property s	ubject to section 367((d))	S9 :
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Donor and a serial					
Property with built-in loss					
Totals					
12a Were any a foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski	poration?	tic corporation that transferred foreign disregarded entity) to be still the still that transferred foreign disregarded entity) to be still the still that transferred foreign disregarded entity) to be still the still transferred for the still transferr	ed substantially all of the a specified 10%-own 12d, and go to line 13. reporation a U.S. share	arded entity) transferred	ranch
Section C-Intar	gible Property S	Subject to Section 367(d)	1		
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's leng on date of	th price transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					
in sec. 367(d)(4)					
Totals					

14a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?	□ Y ₀	es 🗆	No
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	☐ Ye	es	No
C				
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) > \$			
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	□ Y (es 🗆	No
Supp	plemental Part III Information Required To Be Reported (see instructions)			
Part	Additional Information Regarding Transfer of Property (see instructions)			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.			
	(a) Before 2.6987 % (b) After 2.6987 %			
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351			
18	Indicate whether any transfer reported in Part III is subject to any of the following.			
а	Gain recognition under section 904(f)(3)	□ Ye	es 🗸	No
b	Gain recognition under section 904(f)(5)(F)	□ Ye	es 🗸	No
С	Recapture under section 1503(d)	□ Ye	es 🗸	No
d				
19	Did this transfer result from a change in entity classification?			
20a				
	If "Yes." complete lines 20b and 20c.			
b	If "Yes," complete lines 20b and 20c. Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$			
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$			
c	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$			No.
	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		es 🗆	No

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

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

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

OMB No. 1545-0026

Part	U.S. Transferor Information (see instructions) f transferor		Identifying number (see instructions)
	IA FOUNDATION FOR EDUCATION, INC.		35-1813228
1	Is the transferee a specified 10%-owned foreign corporation t	hat is not a controlled for	
2	If the transferor was a corporation, complete questions 2a three		organicorporation: Tes E Ne
а	If the transfer was a section 361(a) or (b) transfer, was the t		er section 368(c)) by
b	five or fewer domestic corporations?		
	Controlling shareholder	Ide	ntifying number
	If the transferor was a marshay of an effiliated many filling		was it the name
С	If the transferor was a member of an affiliated group filin corporation?		, 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)(4) been made?		Yes . No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	actual transferor (but is a	not treated as such under section 367
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EII	N of partnership
RIVA (CAPITAL PARTNERS IV, LP		36-4804829
b c d	Did the partner pick up its pro rata share of gain on the transfels the partner disposing of its entire interest in the partnership is the partner disposing of an interest in a limited partnership securities market?)?	Yes
Part		e instructions)	
4	Name of transferee (foreign corporation)	,	5a Identifying number, if any
CARL	YLE CLO 2017-1X		98-1345911
	Address (including country) MAN CORPORATE CENTRE, 27 HOSPITAL ROAD , GEOI MAN, KY1-9008, CAYMAN ISLANDS	RGETOWN, GRAND	5b Reference ID number (see instructions)
7	Country code of country of incorporation or organization (see	instructions)	
8	Foreign law characterization (see instructions)		
	ORATION		
9	Is the transferee foreign corporation a controlled foreign corporation	oration?	Yes 🗸 No

Part III Infor		ding Transfer of Property	(see instructions)		
Type of property	(a) Date of	(b) Description of	(c) Fair market value on	(d) Cost or other	(e) Gain recognized on
Cash	transfer VARIOUS	property	date of transfer	basis	transfer
10 Was cash	the only property	transferred?			🗹 Yes 🗌 No
Section B-Othe		r than intangible property s	ubject to section 367	And the second s	
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with					
built-in loss					
Totals					
b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the trai	poration?	tic corporation that transferred foreign disregarded entity) to the stick transferred foreign disregarded entity) to the stick of the stick transferred foreign disregarded entity) to the stick transferred foreign disregarded entity) to the stick transferred foreign transferred for the stick transferred foreign transferred fo	ed substantially all of to a specified 10%-own 12d, and go to line 13 poration a U.S. shar	the assets of a foreign by ned foreign corporation? The corporation with respect to the corporation of the	ranch
Section C-Intan	gible Property S	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d Useful Arm's len on date o	gth price f transfer (e) (cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)					
Totals					

14a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life
	reasonably anticipated to exceed 20 years?
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?
C	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section
	1.367(d)-1(c)(3)(ii) for any intangible property?
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in
	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?
Supp	plemental Part III Information Required To Be Reported (see instructions)
Part	Additional Information Regarding Transfer of Property (see instructions)
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
	(a) Before0.000_% (b) After0.2092_%
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
18	Indicate whether any transfer reported in Part III is subject to any of the following.
а	Gain recognition under section 904(f)(3)
b	Gain recognition under section 904(f)(5)(F)
С	Recapture under section 1503(d)
d	
19	Did this transfer result from a change in entity classification?
20a	
_04	If "Yes," complete lines 20b and 20c.
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$
-	Did the domestic corporation not recognize gain or loss on the distribution of property because the
С	LIID THE COMPESTIC COMPORATION NOT RECOGNIZE CAIN OF IOSS ON THE DISTRIBUTION OF PROPERTY DECAUSE THE
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes
21	

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

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

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

OMB No. 1545-0026

Part I U.S. Transferor Information (see instructions)	SANSANTI ANTO ANTONO
Name of transferor	Identifying number (see instructions)
LUMINA FOUNDATION FOR EDUCATION, INC.	35-1813228
	on that is not a controlled foreign corporation? . \square Yes \checkmark No
2 If the transferor was a corporation, complete questions 2a	The same of the sa
a If the transfer was a section 361(a) or (b) transfer, was to	
five or fewer domestic corporations?	- 10 - 12 - 12 - 12 - 12 - 13 - 13 - 12 - 12
b Did the transferor remain in existence after the transfer?	
If not, list the controlling shareholder(s) and their identifying	g number(s).
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group corporation?	
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been mad	 e?
complete questions 3a through 3d.	the actual transferor (but is not treated as such under section 367
Name of partnership	EIN of partnership
RIVA CAPITAL PARTNERS IV, LP	36-4804829
b Did the partner pick up its pro rata share of gain on the tra	ansfer of partnership assets?
c Is the partner disposing of its entire interest in the partner	ship?
d Is the partner disposing of an interest in a limited partn	ership that is regularly traded on an established
securities market?	
Part II Transferee Foreign Corporation Information	(see instructions)
4 Name of transferee (foreign corporation)	5a Identifying number, if any
EIGHTFOLD REAL ESTATE CAPITAL FUND V CAYMAN CORP	98-1337057
6 Address (including country) CRICKET SQUARE, HUTCHINS DRIVE, PO BOX 2681, GRASLANDS	AND CAYMAN, CAYMAN (see instructions)
7 Country code of country of incorporation or organization (see instructions)
8 Foreign law characterization (see instructions)	
CORPORATION	
9 Is the transferee foreign corporation a controlled foreign c	orporation?

Part III Infor		ding 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	property	108,60	Sec.	uansiei
	the only property cip the remainder	transferred? of Part III and go to Part IV.			🗹 Yes 🗌 No
Section B-Othe	r Property (other	r than intangible property s	ubject to section 367	(d))	99
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	6		3		
Inventory					
Other property (not listed under another category)					
Droposty with					
Property with built-in loss					
Totals					
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski	poration?	d. If "No," skip line 12d, and on mount included in gross incorroperty described in section questions 14a through 15.	ed substantially all of to a specified 10%-own 12d, and go to line 13. go to line 13. me as required under some as	he assets of a foreign branch foreign corporation? eholder with respect to the section 91 \$\bigsection 91 \bigsection \bigs	ranch
Section C-Intan	gible Property S	Subject to Section 367(d)		1	
Type of property	(a) Date of transfer	(b) Description of property	(c) (d Useful Arm's length on date of	gth price transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)					
Totals					

14a D	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life		
	easonably anticipated to exceed 20 years?		
	at the time of the transfer, did any of the transferred intangible property have an indefinite useful life?	Yes	No
	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section		
	.367(d)-1(c)(3)(ii) for any intangible property?	Yes	□ No
	the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable		
	the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in		
	Regulations section 1.367(d)-1(c)(3)(ii) ► \$		
	Vas any intangible property transferred considered or anticipated to be, at the time of the transfer or at any ime thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	☐ Yes	□ No
1.67			
Suppler	mental Part III Information Required To Be Reported (see instructions)		
Part IV	Additional Information Regarding Transfer of Property (see instructions)		
16 E	inter the transferor's interest in the transferee foreign corporation before and after the transfer.		
(a	a) Before 0.1248 % (b) After 0.1248 %		
17 Ty	ype of nonrecognition transaction (see instructions) ► IRC SECTION 351		
	ndicate whether any transfer reported in Part III is subject to any of the following.		
a G	Gain recognition under section 904(f)(3)	Yes	✓ No
b G			
c R	Sain recognition under section 904(f)(5)(F)		✓ No
	Sain recognition under section 904(f)(5)(F)	☐ Yes	
d E	***************************************	☐ Yes ☐ Yes	✓ No
	Recapture under section 1503(d)	☐ Yes☐ Yes☐ Yes	✓ No ✓ No
19 D	Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes	✓ No ✓ No ✓ No
19 D 20a D	Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes	✓ No ✓ No ✓ No
19 D 20a D If	Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes	✓ No ✓ No ✓ No
19 D 20a D If b E	Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes	✓ No ✓ No ✓ No
19 D 20a D If b E	Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes ☐ Yes	✓ No ✓ No ✓ No ✓ No
19 D 20a D If b Ei c D	Recapture under section 1503(d)	☐ Yes ☐ Yes ☐ Yes ☐ Yes ☐ Yes	✓ No ✓ No ✓ No ✓ No

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

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

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

OMB No. 1545-0026

Par		-	
	of transferor NA FOUNDATION FOR EDUCATION, INC.		Identifying number (see instructions) 35-1813228
A SECTION	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled force	
1 2	If the transferor was a corporation, complete questions 2a throu		gri corporation? . Tes No
a	If the transfer was a section 361(a) or (b) transfer, was the train		r section 368(c)) by
a	five or fewer domestic corporations?		
b			
	Controlling shareholder	Ider	ntifying number
С	If the transferor was a member of an affiliated group filing corporation?		was it the parent
	If not, list the name and employer identification number (EIN) of	the parent corporation	
	in not, list the name and employer identification number (Em) or	the parent corporation.	
	Name of parent corporation	EIN of p	parent corporation
d	Have basis adjustments under section 367(a)(4) been made? .		Yes 🗆 No
3	If the transferor was a partner in a partnership that was the accomplete questions 3a through 3d.	ctual transferor (but is no	ot treated as such under section 367
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	FIN	of partnership
	rume of parateromp	2	or parational p
ABRA	MS CAPITAL PARTNERS II, LP		04-3455023
	,		
b	Did the partner pick up its pro rata share of gain on the transfer		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 securities market?	that is regularly traded	on an established Yes ✓ No
Part		nstructions)	<u>.</u> 163 • NO
4	Name of transferee (foreign corporation)		5a Identifying number, if any
MADIS	SON PARK FUNDING XXIII LTD		,
6	Address (including country)		5b Reference ID number
	TON HOUSE 75 FORT STREET, GEORGE TOWN, GRAND	CAYMAN, KY1-1108,	(see instructions)
CAY	MAN ISLANDS		MPFXXIII
7	Country code of country of incorporation or organization (see in	structions)	
CJ			
8	Foreign law characterization (see instructions)		
	PORATION	-4:0	
9	Is the transferee foreign corporation a controlled foreign corporation	ation?	

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

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

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

OMB No. 1545-0026

Name o	f transferor		Identifying number (see instructions)
	NA FOUNDATION FOR EDUCATION, INC.		35-1813228
1	Is the transferee a specified 10%-owned foreign corporation to	hat is not a controlled fore	
2	If the transferor was a corporation, complete questions 2a thro		.g., co.po.a.c : 🗀 : co 🖭 : .c
a b			Yes . No
	If not, list the controlling shareholder(s) and their identifying nu	ımber(s).	
	Controlling shareholder	Ide	ntifying number
С	If the transferor was a member of an affiliated group filin corporation?	•	
	If not, list the name and employer identification number (EIN) of	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made? .		Yes No
u	Trave basis adjustments under section 507(a)(4) been made:		les la No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	actual transferor (but is n	ot treated as such under section 36
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EIN	l of partnership
RIVA (CAPITAL PARTNERS IV, LP		36-4804829
b	Did the partner pick up its pro rata share of gain on the transfe	er of partnership assets?	□ Yes ☑ No
C	Is the partner disposing of its entire interest in the partnership		Yes V No
d	Is the partner disposing of an interest in a limited partnersh	ip that is regularly traded	
Dort	securities market?		□ Yes ☑ No
Part 4	Transferee Foreign Corporation Information (see Name of transferee (foreign corporation)	e instructions)	5a Identifying number, if any
_	SON PARK FUNDING XXIII LTD		Sa identifying number, if any
6 CLIF	Address (including country) TON HOUSE 75 FORT STREET, GEORGE TOWN, GRAND MAN ISLANDS	D CAYMAN, KY1-1108,	5b Reference ID number (see instructions)
		instructions)	MPFXXIII
7 CJ	Country code of country of incorporation or organization (see	maducuons)	
8	Foreign law characterization (see instructions)		
CORP	PORATION		
9	Is the transferee foreign corporation a controlled foreign corporation	oration?	Yes No.

Part III Infor		ding 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 STATEM	ENT	SEE STATEMEN	NT	
If "Yes," sk		of Part III and go to Part IV.			🗹 Yes 🗌 No
Section B-Othe		er than intangible property s			9
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
12a Were any a foreign con If "Yes," go b Was the tracking of If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tracking if "No," ski	poration?	stic corporation that transferred foreign disregarded entity) to the control of t	ed substantially all of to a specified 10%-own 12d, and go to line 13 poration a U.S. share	the assets of a foreign brond foreign corporation? The reholder with respect to the corporation of the corp	ranch
Section C-Intar	gible Property	Subject to Section 367(d)		-	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful Arm's len on date o	d) ggth price f transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					
in sec. 367(d)(4)					
Totals					

14a	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life
	reasonably anticipated to exceed 20 years?
b	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?
C	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section
	1.367(d)-1(c)(3)(ii) for any intangible property?
d	If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable
	to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in
	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?
Supp	lemental Part III Information Required To Be Reported (see instructions)
	, ,
Part	N Additional Information Regarding Transfer of Property (see instructions)
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
	(a) Before0.2103_% (b) After0.5126_%
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
18	Indicate whether any transfer reported in Part III is subject to any of the following.
а	Gain recognition under section 904(f)(3)
b	Gain recognition under section 904(f)(5)(F)
С	Recapture under section 1503(d)
d	Exchange gain under section 987
19	Did this transfer result from a change in entity classification?
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions . Yes V No
200	If "Yes," complete lines 20b and 20c.
h	
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? \square Yes \square No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation

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	=		
	=		
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ı	s	١	1
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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		20,857		
Cash	VARIOUS		221,011		

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

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

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OMB No. 1545-0026

Name o	f transferor		Identifying number (see instructions)
	IA FOUNDATION FOR EDUCATION, INC.		35-1813228
1	Is the transferee a specified 10%-owned foreign corporation	that is not a controlled fore	ign corporation? . Yes No
2	If the transferor was a corporation, complete questions 2a thr	rough 2d.	
а	If the transfer was a section 361(a) or (b) transfer, was the		
	five or fewer domestic corporations?		
b	Did the transferor remain in existence after the transfer? . If not, list the controlling shareholder(s) and their identifying n		Yes 🗆 No
	Thot, list the controlling shareholder(s) and their identifying h	umber(s).	
	Controlling shareholder	Ide	ntifying number
С	If the transferor was a member of an affiliated group fili corporation?	ng a consolidated return,	was it the parent
	If not, list the name and employer identification number (EIN)	of the parent corporation.	
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?		Yes . No
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	e 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	l of partnership
ABRA	MS CAPITAL PARTNERS II, LP		04-3455023
b c	Did the partner pick up its pro rata share of gain on the transfils the partner disposing of its entire interest in the partnershi	-	□ Yes ☑ No □ Yes ☑ No
d	Is the partner disposing of an interest in a limited partners securities market?	·	
Part		e instructions)	
4	Name of transferee (foreign corporation)		5a Identifying number, if any
MADI:	SON PARK FUNDING XXX, LTD Address (including country)		5b Reference ID number
-	MAN CORPORATE CENTRE, 27 HOSPITAL ROAD, GEOR	RGE TOWN, GRAND	(see instructions)
	MAN, KY1-9008, CAYMAN ISLANDS	<u> </u>	MPFXXX3228
7	Country code of country of incorporation or organization (see	instructions)	
CJ 8	Foreign law characterization (see instructions)		
_	ORATION		
9	Is the transferee foreign corporation a controlled foreign corp	oration?	

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

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

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

OMB No. 1545-0026

Par			
	of transferor NA FOUNDATION FOR EDUCATION, INC.		Identifying number (see instructions) 35-1813228
A SECTION	Is the transferee a specified 10%-owned foreign corporation	that is not a controlled for	
1 2	If the transferor was a corporation, complete questions 2a thr		eign corporation? . Tes No
a	If the transfer was a section 361(a) or (b) transfer, was the t		er section 368(c)) by
a	five or fewer domestic corporations?		
b	Did the transferor remain in existence after the transfer? .		
	If not, list the controlling shareholder(s) and their identifying no		
	,		
	Controlling shareholder	Ide	entifying number
С	If the transferor was a member of an affiliated group filing corporation?		, was it the parent
	If not, list the name and employer identification number (EIN)		
	Name of parent corporation	EIN of	parent corporation
d	Have basis adjustments under section 367(a)(4) been made?		Yes . No
3	If the transferor was a partner in a partnership that was the	actual transferor (but is a	not treated as such under section 367
	complete questions 3a through 3d.		
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EII	N of partnership
RIVA (CAPITAL PARTNERS IV, LP		36-4804829
h	Did the partner pick up its pro rata share of gain on the transf	er of partnership assets?	Yes 🗸 No
b	Is the partner disposing of its entire interest in the partnership		Yes V No
	Is the partner disposing of an interest in a limited partnersh		
d	s the partner disposing of an interest in a limited partnersi securities market?	iip triat is regularly trade	d on an established Yes ✓ No
Part		e instructions)	les wino
4	Name of transferee (foreign corporation)	o mondonorioj	5a Identifying number, if any
	SON PARK FUNDING XXX, LTD		oa identifying number, it any
6	Address (including country)		5b Reference ID number
_	MAN CORPORATE CENTRE, 27 HOSPITAL ROAD, GEOF	RGE TOWN GRAND	(see instructions)
	MAN, KY1-9008, CAYMAN ISLANDS	TOL TOWN, OR THE	,
7	Country code of country of incorporation or organization (see	instructions)	MPFXXX3228
CJ	See of country of incorporation of organization (see	maductiona)	
8	Foreign law characterization (see instructions)		
	PORATION		
9	Is the transferee foreign corporation a controlled foreign corporation	oration?	
9	is the transfered foreign corporation a controlled foreign corporation	oradon:	<u>v</u> tes 🗆 No

Part III Infor		ding 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 STATEM	ENT	SEE STATEMEN	NT	
If "Yes," sk		of Part III and go to Part IV.			🗹 Yes 🗌 No
Section B-Othe		er than intangible property s			9
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
12a Were any a foreign con If "Yes," go b Was the tracking of If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tracking if "No," ski	poration?	stic corporation that transferred foreign disregarded entity) to the control of t	ed substantially all of to a specified 10%-own 12d, and go to line 13 poration a U.S. share	the assets of a foreign brond foreign corporation? The reholder with respect to the corporation of the corp	ranch
Section C-Intar	gible Property	Subject to Section 367(d)		-	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful Arm's len on date o	d) ggth price f transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					
in sec. 367(d)(4)					
Totals					

14a b c d	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?
Supp	lemental Part III Information Required To Be Reported (see instructions)
Part	Additional Information Regarding Transfer of Property (see instructions)
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
17	(a) Before0.000 % (b) After0.1878 % Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
18	Indicate whether any transfer reported in Part III is subject to any of the following.
а	Gain recognition under section 904(f)(3)
b	
c	
	Gain recognition under section 904(f)(5)(F)
d	Gain recognition under section 904(f)(5)(F)
d 19	Gain recognition under section 904(f)(5)(F)
19	Gain recognition under section 904(f)(5)(F)
	Gain recognition under section 904(f)(5)(F)
19 20a	Gain recognition under section 904(f)(5)(F)
19 20a b	Gain recognition under section 904(f)(5)(F)
19 20a	Gain recognition under section 904(f)(5)(F)
19 20a b	Gain recognition under section 904(f)(5)(F)

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	ARIOUS		11,335		
Cash	ARIOUS		120,115		

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

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

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

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

OMB No. 1545-0026

Name of transferor LUMINA FOUNDATION FOR EDUCATION, INC. 1 Is the transferee a specified 10%-owned foreign corporation that is not a control 2 If the transferor was a corporation, complete questions 2a through 2d. a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled five or fewer domestic corporations?	Identifying number (see instructions) 35-1813228 Iled foreign corporation? . Yes No
 Is the transferee a specified 10%-owned foreign corporation that is not a control If the transferor was a corporation, complete questions 2a through 2d. If the transfer was a section 361(a) or (b) transfer, was the transferor controlled five or fewer domestic corporations?	
 If the transferor was a corporation, complete questions 2a through 2d. If the transfer was a section 361(a) or (b) transfer, was the transferor controlled five or fewer domestic corporations? 	iled loreign corporations . L Tes V No
a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled five or fewer domestic corporations?	
five or fewer domestic corporations?	d (under section 368(c)) by
b Did the transferor remain in existence after the transfer?	Yes 🗆 No
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolidated corporation?	return, was it the parent
If not, list the name and employer identification number (EIN) of the parent corpo	
in not, not the name and employer recruitment of the parent corpe	nucon.
Name of parent corporation	EIN of parent corporation
d Have basis adjustments under section 367(a)(4) been made?	Yes 🗌 No
3 If the transferor was a partner in a partnership that was the actual transferor (complete questions 3a through 3d.	but is not treated as such under section 367
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
ABRAMS CAPITAL PARTNERS II, LP	04-3455023
b Did the partner pick up its pro rata share of gain on the transfer of partnership as	ssets?
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	
securities market?	□ Yes ☑ No
Part II Transferee Foreign Corporation Information (see instructions)	5a Identifying number, if any
A Name of transferse (foreign corporation)	Sa identifying number, if any
4 Name of transferee (foreign corporation) MDPK 2017-23A	Eh Deference ID aventer
MDPK 2017-23A	5b Reference ID number
MDPK 2017-23A	(see instructions)
MDPK 2017-23A 6 Address (including country)	
MDPK 2017-23A 6 Address (including country) CLIFTON HOUSE, 75 FORT STREET, GEORGE TOWN, GRAND CAYMAN,	(see instructions)
MDPK 2017-23A 6 Address (including country) CLIFTON HOUSE, 75 FORT STREET, GEORGE TOWN, GRAND CAYMAN, KY101108, CAYMAN ISLANDS 7 Country code of country of incorporation or organization (see instructions) CJ	(see instructions)
MDPK 2017-23A 6 Address (including country) CLIFTON HOUSE, 75 FORT STREET, GEORGE TOWN, GRAND CAYMAN, KY101108, CAYMAN ISLANDS 7 Country code of country of incorporation or organization (see instructions)	(see instructions)

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

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

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

Parl			SATE OF THE COURT
	of transferor		Identifying number (see instructions)
ASSESSMENT OF	NA FOUNDATION FOR EDUCATION, INC.		35-1813228
1 2	Is the transferee a specified 10%-owned foreign corporation If the transferor was a corporation, complete questions 2a the		ign corporation? . ☐ Yes ✓ No
а	If the transfer was a section 361(a) or (b) transfer, was the		r section 368(c)) by
	five or fewer domestic corporations?		Yes 🗆 No
b	Did the transferor remain in existence after the transfer? .		Yes . No
	If not, list the controlling shareholder(s) and their identifying n	iumber(s).	
	Controlling shareholder	Ider	ntifying number
С	If the transferor was a member of an affiliated group fili 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)(4) been made?		Yes . No
•	If the transferred control is a control is the transferred to		
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	e actual transferor (but is n	of freated as such under section 367)
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	FIN	of partnership
	Nume of partitioning		or paraticionip
RIVA	CAPITAL PARTNERS IV, LP		36-4804829
h	Did the partner pick up its pro rata share of gain on the transf	for of partnership assets?	□ Yes ☑ No
C	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	<u> </u>	e instructions)	
4	Name of transferee (foreign corporation)		5a Identifying number, if any
-	(2017-23A		Eh Deference ID number
6 CLIF	Address (including country) TON HOUSE, 75 FORT STREET, GEORGE TOWN, GRAN	ND CAYMAN	5b Reference ID number (see instructions)
	01108, CAYMAN ISLANDS	VD O/THVI/TIV,	MDPK2017-23A
7	Country code of country of incorporation or organization (see	e instructions)	
CJ			
8	Foreign law characterization (see instructions)		
	PORATION		
9	Is the transferee foreign corporation a controlled foreign corp	oration?	✓ Vas No

Part III Infor		ding 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 STATEM	ENT	SEE STATEMEN	NT	
If "Yes," sk		of Part III and go to Part IV.			🗹 Yes 🗌 No
Section B-Othe		er than intangible property s			9
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					
12a Were any a foreign con If "Yes," go b Was the tracking If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tracking If "No," ski	poration?	stic corporation that transferred foreign disregarded entity) to the control of t	ed substantially all of to a specified 10%-own 12d, and go to line 13 poration a U.S. share	the assets of a foreign brond foreign corporation? The reholder with respect to the corporation of the corp	ranch
Section C-Intar	gible Property	Subject to Section 367(d)		-	
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful Arm's len on date o	d) ggth price f transfer (e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					
in sec. 367(d)(4)					
Totals					

14a b c d	reasonably anticipated to exceed 20 years?	☐ Yes	□ No
	time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	⊔ Yes	□ No
Jupp	mental Part III III of Madon Nequired To be Neported (See III Structions)		
Part	Additional Information Regarding Transfer of Property (see instructions)		
40			
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.000 % (b) After 0.378 %		
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	☐ Yes	✓ No
b	Gain recognition under section 904(f)(5)(F)		
С	Recapture under section 1503(d)	☐ Yes	√ No
d	Exchange gain under section 987		
19	Did this transfer result from a change in entity classification?		
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.		
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
c	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
·	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		No
21	property fractaced in the contract of c.e. trade of backhood and of regulations couldn't 1.007(c)-2(b)(2):		
	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		

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	6/30/2017		22,011		
Cash	VARIOUS		233,250		

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

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

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

OMB No. 1545-0026

Par			
	of transferor NA FOUNDATION FOR EDUCATION, INC.		Identifying number (see instructions) 35-1813228
1	Is the transferee a specified 10%-owned foreign corporation	that is not a controlled fore	
2	If the transferor was a corporation, complete questions 2a the		ign corporation: Tes E 110
а	If the transfer was a section 361(a) or (b) transfer, was the		er section 368(c)) by
b	five or fewer domestic corporations?		Yes . No
	Controlling shareholder	Ide	ntifying number
С	If the transferor was a member of an affiliated group fili 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)(4) been made?		Yes . No
3	If the transferor was a partner in a partnership that was the	antical transferor (but in m	est treated as such under section 26
3	If the transferor was a partner in a partnership that was the complete questions 3a through 3d.	actual transferor (but is r	of treated as such under section 367
а	List the name and EIN of the transferor's partnership.		
	Name of partnership	EIN	l of partnership
	The state of parameters p		
RIVA (CAPITAL PARTNERS IV, LP		36-4804829
b	Did the partner pick up its pro rata share of gain on the transi	fer of partnership assets?	□ Yes ☑ No
C	Is the partner disposing of its entire interest in the partnershi		□ Yes ☑ No
d	Is the partner disposing of an interest in a limited partners	hip that is regularly traded	d on an established
	securities market?		🗌 Yes 🗹 No
Part	• • • • • • • • • • • • • • • • • • • •	e instructions)	
4 00TB	Name of transferee (foreign corporation)		5a Identifying number, if any
6	Address (including country)		5b Reference ID number
_	OX 1093 BOUNDARY HALL CRICKET SQUARE, GEORG	E TOWN, GRAND	(see instructions)
	MAN, KY1-1102, CAYMAN ISLANDS	,	OCTR2014-5A
7	Country code of country of incorporation or organization (see	instructions)	
CJ		-	
8	Foreign law characterization (see instructions)		
	ORATION	avatian0	
9	Is the transferee foreign corporation a controlled foreign corp	oration?	

Part III Infor		ding 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	property	122,80	1000000	uansiei
	the only property kip the remainder	transferred?			🗹 Yes 🗌 No
Section B-Othe	r Property (othe	r than intangible property s	ubject to section 367	(d))	88
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Dranarhowith					
Property with built-in loss					
Totals					
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra If "No," ski	poration?	d. If "No," skip line 12d, and on the control of th	ed substantially all of the a specified 10%-own 12d, and go to line 13. poration a U.S. share	he assets of a foreign branch foreign corporation? eholder with respect to the component of the component o	ranch
Section C-Intar	gible Property S	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's leng on date of	th price transfer (e) (c) (c) (c) (c)	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)					
Totals					

14a b c d	reasonably anticipated to exceed 20 years?	☐ Yes	□ No
Supp	plemental Part III Information Required To Be Reported (see instructions)		
Part	Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
17	(a) Before0.000 % (b) After0.2816 % Type of nonrecognition transaction (see instructions) ► IRC SECTION 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	✓ No
b	Gain recognition under section 904(f)(5)(F)		
C	Recapture under section 1503(d)		
d	Exchange gain under section 987		
19	Did this transfer result from a change in entity classification?		
20a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions .		
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
c	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
•	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?		□ No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	_	✓ No

Department of the Treasury Internal Revenue Service

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

Information furnished for the foreign partnership's tax year

beginning **JAN 01** , 2018, and ending OMB No. 1545-1668

	of person filing this return IINA FOUNDATION FOR EDUCATION, INC.								Filer's identification number 35-1813228							
			ling this form with y		rn)		Category of		(see Categories o		11000	CALIFORNIA S	d check a	oplica	ble box(es)):	
						20000	iler's tax ye	1.71. V= 30.40	O TOTAL CONTRACTOR		DESCRIPTION OF THE PROPERTY OF	and ending	DEC	31	,20 18	
C	Filer's s	share of liab	ilities: Nonrecour	se \$		-			urse financing \$	- 0.5	,	Other	0.0	•	,20 .0	
D	recount of		of a consolidated		t not the paren		1000		3.	000000	e parent:					
	Name				•				EIN		•					
	Address	S							100-010000							
E	Check i	if any excep	ted specified fore	eign financ	ial assets are r	eporte	ed on this	forr	n. See instruction	ons .					🗆	
F	Informa	ation about o	certain other parti	ners (see i	nstructions)											
		(1) Name			(2) Addres	SS			(3) Identification r	number	(4	4) Check applicable box(es)			s)	
		(1) 1141110			(4)				(c) racriamodilorri		Category	1 Ca	tegory 2	Cons	tructive owner	
	APITAL		of foreign partne RESOURCES FU		YMAN FEEDER	R LP.			2(a) EIN (if any)						
GRAI		MAN KY1-1						2(b) Reference ID number (see instructions) CDCAPITAL								
									3 Country und	er who	se laws or	ganized				
									CAYMAN ISLA	NDS						
4	Date of organiz	tate of principal place of business activity code number 7 Principal business 8a Fundantial State of principal place of activity code number 7 Principal business activity				unctional o	currency		,	ge rate tructions)						
	11/16/2		CAYMAN ISLAN	ND6	523900	,			TING	IIE D	OLLAR		`		,	
н			ng information for					LO	IING	03 D	OLLAR					
<u>"</u>			d identification n		• •			Ch	neck if the foreig	ın partı	nership mu	ust file:				
	United States									rm 8804	_	m 1065				
						Se	rvice Center wher	e Form	1065 is filed	d:						
3	Name a	and address	of foreign partne	ership's ag	ent in country	of	4	Na	me and address of	f persor	n(s) with cus	tody of the	e books a	nd rec	ords of the	
	organiz	zation, if any							eign partnership,							
								MS HOUSE, 20 GENESIS CLOSE, GRAND CAYMAN, KY-1104, AYMAN ISLANDS					-1104,			
								_								
5			ear, did the foreign ation 267A? See i				-		or royalty for w						✓ No	
			total amount of t										-	03		
6		,	a section 721(c)						tions section 1.	 721(c)-	 -1T(b)(14)?		<u></u>	es	✓ No	
7			allocations made	•									► □ Y			
8			of Forms 8858					Vith	Respect to Fo	reian l	Disregarde	ed Entitie				
			n Branches (FBs)	•								1	•			
9	How is	s this partne	rship classified u	nder the la	aw of the count	ry in w	vhich it's	orga	anized? . ▶	- LIMI	TED PAR	TNERSH	IP			
10a	Does t	the filer have	an interest in the f	foreign part	tnership, or an in	nterest	indirectly	thro	ugh the foreign p	artners	ship, that's	a separa	te			
	unit un	nder Reg. 1.1	503(d)-1(b)(4) or pa	art of a con	nbined separate	unit ur	nder Reg.	1.15	603(d)-1(b)(4)(ii)? I	f "No,"	skip quest	ion 10b ▶	- 🗌 Y	es	No	
b			eparate unit or cor				consolidate	ed lo	oss, as defined in	Reg. 1	.1503(d)-1(b)(5)(ii)? ▶	- 🗆 Y	es	No	
11			ship meet both of o's total receipts f				250 000)						
			partnership's to						than \$1 million.	}		!	► ⊔ Y	es	No	
			mplete Schedules			de weter	un includi-		oomnonidae asta	dula -	nd state	ata a11-	tha bast	of re-	lmanula da -	
	ere Only re Filing	and belief, i	t is true, correct, an	d complete	. Declaration of p											
This Fo	orm Itely and	information	of which preparer h	nas any kno	wiedge.					l.						
	th Your	Signatu	re of general partne	r or limited	liability company	memb	or			 	Date					
			reparer's name	, or mineu	Preparer's s					Date	outo.	Check if PTIN				
Paid	l barer -	отурор	. sparor o marito		. roparor s	g. ratul		Sile.			Check if self-employed					
•	Only	Firm's name	 		·							Firm's El	N►			
	Cilly	Firm's addre	ess ►									Phone no).			

Form 8865 (2018)

Sch	edule	box b , enter the name, addi	ress, and U.S. t	axpayer ide tions.	ntifica	ation number (if any				
		a			Owns a	a constructive inte		- 1	Che	ck if	Check if
		Name	Ad	dress		Identification nun	nber (if	any)		eign rson	direct partner
Sch	edule	A-1 Certain Partners of Foreign	n Partnership (see instructi	ons)						70 24
		Name		dress		Identificat	ion num	ber (if a	ny)		Check if foreign person
Sch	edule	A-2 Foreign Partners of Section	n 721(c) Partne	e rship (see i	nstru	ctions)					20
Name	e of fore		Country of organization (if any)	U.S. taxpay identification no (if any)	/er	Check if related to U.S. transferor		Perc Capital	entag	e intere	st Profits
			()	()				•	%		%
									%		%
Does	the na	artnership have any other foreign perso	n as a direct part	ner?						Yes	□ No
	edule		ll partnerships (foreign or d	omes	1	ne for	eign p	oartr	nersh	
		Name	Ad	dress		EIN (if any)			ıl ordir me or		foreign partnership
											рания
Sch	edule	B Income Statement—Trade	or Business In	come							
Cauti	on: Inc	clude only trade or business income and	expenses on lines	1a through 22	belov	w. See the instruc	ctions	for mo	re inf	format	ion.
	1a	Gross receipts or sales			1a						
	b	Less returns and allowances			1b			1c			
	2	Cost of goods sold						2			
ne	3	Gross profit. Subtract line 2 from line	1c					3			
ncome	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)									
<u>2</u>	5	Net farm profit (loss) (attach Schedule F (Form 1040))									
_	6	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797)									
	7	Other income (loss) (attach statement)									
	8	Total income (loss). Combine lines 3						8			
-	9	Salaries and wages (other than to par						9			
ons	10	Guaranteed payments to partners .						10			
itati	11	Repairs and maintenance						11			
틑	12	Bad debts						12			
s fo	13	Rent						13			
tion	14	Taxes and licenses						14			
truc	15	Interest (see instructions)						15			
Deductions (see instructions for limitations)	16a	Depreciation (if required, attach Form									
es)	b	Less depreciation reported elsewhere	on return		16b			16c			
3	17	Depletion (Don't deduct oil and gas d	lepletion)					17			
<u>.</u>	18	Retirement plans, etc						18			
텇	19	Employee benefit programs						19			
즃	20	Other deductions (attach statement)						20			
ڡ	21	Total deductions. Add the amounts s						21			
	22	Ordinary business income (loss) from						22			
	23	Interest due under the look-back meth						23			
ĭ	24	Interest due under the look-back met		24							
Ĕ					-	The second secon		25			
a <u>Ş</u>	25		payment (see instructions)								
۵	26							26			
	27	Total balance due. Add lines 23 thro						27			
Tax and Payment	28	Payment (see instructions)						28			
Ta	29	Amount owed. If line 28 is smaller than						29			
	30	Overpayment. If line 28 is larger than	illie 27, enter ove	erpayment				30			

Form 8865 (2018) Page **3**

Sched	lule 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	3c
	4	Guaranteed payments	4
Income (Loss)	5	Interest income	5
2	6	Dividends and dividend equivalents: a Ordinary dividends	6a
e		b Qualified dividends 6b	
Ē		c Dividend equivalents 6c	
ည္	7	Royalties	7
<u> </u>	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8
	9a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a
	b	Collectibles (28%) gain (loss)	
	C	Unrecaptured section 1250 gain (attach statement) 9c	
	10	Net section 1231 gain (loss) (attach Form 4797)	10
	11	Other income (loss) (see instructions) Type ▶	11
9	12	Section 179 deduction (attach Form 4562)	12
o	13a	Contributions	13a
당	b	Investment interest expense	13b
Deductions	c	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)
6	d	Other deductions (see instructions) Type	13d
٠	14a	Net earnings (loss) from self-employment	14a
Self- nplo 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
"	b	Low-income housing credit (other)	15b
豊	c	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 ▶	
	b	Gross income from all sources	16b
ø	C	Gross income sourced at partner level	16c
ctions		Foreign gross income sourced at partnership level	
ŧ	d	Section 951A category ► e Foreign branch category ►	16e
	f	Passive category ► g General category ► h Other (attach statement) ►	16h
an		Deductions allocated and apportioned at partner level	
Foreign Transa	i	Interest expense ▶ j Other	16j
g		Deductions allocated and apportioned at partnership level to foreign source income	
<u>e</u>	k	Section 951A category ► I Foreign branch category ►	161
윤	m	Passive category ► o Other (attach statement) ►	160
	р	Total foreign taxes (check one): ▶ □ Paid □ Accrued	16p
	q	Reduction in taxes available for credit (attach statement)	16q
	17a	Other foreign tax information (attach statement)	470
a X	17a	Post-1986 depreciation adjustment	17a
te T	b	Adjusted gain or loss	17b
E 5 C	c d	Depletion (other than oil and gas)	17c
Alternative Minimum Tax (AMT) Items			17e
ZΞS	e f	Oil, gas, and geothermal properties—deductions	17f
_	18a	Tax-exempt interest income	18a
<u>.</u>	b	Other tax-exempt income	18b
ıat	c	Nondeductible expenses	18c
Ĕ	19a	Distributions of cash and marketable securities	19a
Other Information	b	Distributions of other property	19b
<u>_</u>	20a	Investment income	20a
the the	b	Investment expenses	20b
Ò	•	Other items and amounts (attach statement)	

Page 4

Sche	edule L Balance Sheets per Books. (No	t required if Item I	H11, page 1, is a	nswered "Yes.")	
*		Beginning	of tax year	End of	tax year
	Assets	(a)	(b)	(c)	(d)
1	Cash				
2a	Trade notes and accounts receivable			7	
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)		8	, (A	
9a	Buildings and other depreciable assets				
b	Less accumulated depreciation				
10a	Depletable assets				
b	Less accumulated depletion				
11	Land (net of any amortization)				
12a	Intangible assets (amortizable only)				
b	Less accumulated amortization				
13	Other assets (attach statement)				
14	Total assets				
	Liabilities and Capital				
15	Accounts payable				
16	Mortgages, notes, bonds payable in less than 1 year				
17	Other current liabilities (attach statement) .				
18	All nonrecourse loans				
19a	Loans from partners (or persons related to partners)				
b	Mortgages, notes, bonds payable in 1 year or more				
20	Other liabilities (attach statement)				
21	Partners' capital accounts				
22	Total liabilities and capital				

Form **8865** (2018)

Form 88	865 (2018)							Page 5
Sche	dule M	Balance Sheets for	r Interest Allocation	on		53		
					Beginn tax	ning of	(b) End of tax year	
1	Total U.S. a	assets			0 5900	0		9
2	Total foreig	n assets:						
a	Passive cat	tegory			rs 20€02			
b	General car	tegory			65 FW			
C	Other (attac	ch statement)						-
Sche	edule M-1	Reconciliation of H11, page 1, is ans		r Books	With Income (Lo	oss) per Return	n. (Not required in	f Item
201	Not income	(loos) nou books		6	Income recorded			
1		(loss) per books.			tax year not			
2		luded on Schedule K,			Schedule K, line (itemize):	s 1 through 11		
		3c, 5, 6a, 7, 8, 9a, 10, t recorded on books			Tax-exempt intere	et ¢		
	this tax yea			a	rax-exempt intere			
	\$	ir (iterriize).		_				
3	*	d payments (other		7	Deductions include K, lines 1 through			
3		insurance)			charged against b			
		•			tax year (itemize):	ook income this		
4		recorded on books ear not included on		а	Depreciation \$			
	•	K, lines 1 through		_				
		6p (itemize):						
а	Depreciation							
b		entertainment \$		8	Add lines 6 and 7			
				9	Income (loss). S	Subtract line 8		
		through 4			from line 5			
Sche		Analysis of Partne	rs' Capital Accour				nswered "Yes.")	
1		beginning of tax year		6	Distributions: a C			
2	Capital con					roperty		
		a Cash		7	Other decreases (i	temize): \$		
_		b Property						
3		e (loss) per books .						
4	Other incre	ases (itemize): \$						+-
				8	Add lines 6 and 7			+
_				9	Balance at end			
5	Add lines 1	through 4			Subtract line 8 fro	m line 5		

Form **8865** (2018)

Form 8865 (2018)

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	Commissions received				
5	Rents, royalties, and license fees received				
6	Distributions received				
7	Interest received				
8	Other				
9	Add lines 1 through 8				
10	Purchases of inventory				
11	Purchases of tangible property other than inventory				
12	Purchases of property rights (patents, trademarks, etc.)				
13	Compensation paid for technical, managerial, engineering, construction, or like services				
14	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
17	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance during the tax year). See instructions				
21	Amounts loaned (enter the maximum loan balance during the tax year). See instructions				

Form **8865** (2018)

Page 6

SCHEDULE O (Form 8865)

(Rev. December 2018)

Department of the Treasury

Transfer of Property to a Foreign Partnership (Under Section 6038B)

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

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

OMB No. 1545-1668

Internal Revenue Service	· ·	Go to www.irs	s.gov/Form8865 for i	nstructions and the	latest informa	ition.	
Name of transferor LUMINA FOUNDATION	ON FOR EDUCA	ATION, INC.				Filer's identifying nur 35-18	mber 313228
Name of foreign partners CD CAPITAL NATUR		ES FUND II CA	YMAN FEEDER LP.	EIN (if any)	2	Reference ID number	r (see instructions) APITAL
b If "Yes," was Was any inta time thereaft	b)(14))? See in the gain defer angible proper ter, a platform	structions . ral method approperty transferred contribution a	ership (as defined in 	cognition of gain up	on the contrib	ution of property? transfer or at any	
Part I Transf	ers Reportab	le Under Sec	tion 6038B				
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery perio	od Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		338,393				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			338,393		0		0
	nsferor's perc	entage interes	st in the partnership			% (b) After the	transfer VARIOUS %
Supplemental Info			eported (see instru	uctions):			
(a) Type of property	(b) Date of original transfer	(c) Date of	(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 repo		schedule subject to	gain recognition	under section	n 904(f)(3) or	☐ Yes ☑ No

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

Information furnished for the foreign partnership's tax year beginning **JAN 01** , 2018, and ending

OMB No. 1545-1668

Attachment Sequence No. 118

Department of the Treasury Internal Revenue Service

		filing this retu			Filer's identification number 35-1813228											
	MINISTER DESIGNATION		FOR EDUCATION, INC	193112							5.500		60			
Filer's	address (i	if you aren't fi	ling this form with your ta	x return)		A Catego	ory of file	2 \square	Categories 6		4	struction	ns and o	check ap	oplicat	ole box(es)):
					_	B Filer's	tax year	beginn	ing JAN	01 ,	20 18	, and e	ending	DEC	31	,20 18
C	Filer's s	share of liab	ilities: Nonrecourse \$			Qualified	nonrec	ourse	financing (\$		0	ther \$			
D	If filer is	a member	of a consolidated grou	up but no	ot the parent	, enter the	follow	ing info	ormation a	bout th	ne paren	t:				5
	Name		100						EIN							
	Address															
E			ted specified foreign f			eported on	this fo	rm. Se	e instructi	ons .					-	· · <u> </u>
F	Informa	ition about o	certain other partners (see instr	ructions)			_			1	(4) Ob	eck app	liaabla	h a v / a /	
		(1) Name			(2) Addres	SS		(3) Ide	entification	number		• •		gory 2	, `	tructive owner
											Categ	ory i	Cate	gory 2	Cons	ructive owner
	ERATIO	N IM CLIMA	of foreign partnership TE SOLUTIONS FUN					2(a)	EIN (if any	y)						
		T PARK 481 NY 10036	TH FLOOR					2(b)	Reference	e ID nu	mber (se	e insti	ruction	s)		
INEVV	TORK	WT 10030						, ,			•	NE322		,		
								3 C	ountry und	ler who	se laws	organi	ized			
								UNITE	ED KINGDON	(ENGL	AND, NORT	THERN I	RELAND	, SCOTL	AND A	ND WALES)
4	Date of organiz		5 Principal place of business		incipal busir tivity code n		1	7 Principal business activity 8a Functional currency (see instructional currency)								
	4/11/2014 UNITED STATES 523900 INVESTING US DO					OLLAR										
Н			ng information for the t		•	•										
1			d identification number	er of age	nt (if any) in t	the	_ l _		f the forei							
	United States						'		n 1042		rm 8804		Form	1065		
							*	Service	Center whe	re Form	1065 is f	iled:				
	Name		of favoien newtoevolis	'a amant	in anuntura		4.	lanaa an	d adduses a	f = ====	n/a\ith .		of the b	a alva av	. d u. a	anda of the
3		and address ation, if any	of foreign partnership	s agent	in country o	וע			nd address o partnership,							
FLO	ERATIO	N INVESTMIDON, ENG	IENT MANAGEMENT LAND, WIB 5AN, UNIT SCOTLAND AND WAL	ED KIN					,							
5	During	the tax ye	ear, did the foreign partition 267A? See instru	artnershi	p pay or ac	crue any i	interes	t or ro	yalty for v	which	the dedu	uction	is not		06	✓ No
			total amount of the di		 I deductions									\$	03	
6		•	a section 721(c) partn				v Regu	 lations	section 1	. 721(c)	 -1T(b)(14	1)?		Y	es	✓ No
7			allocations made by the										. •	☐ Y		✓ No
8		• •	r of Forms 8858, Info				ns Wit	h Resi	pect to Fo	oreian	Disregar	ded F				-
			n Branches (FBs), atta										. ▶			
9	How is	s this partne	ership classified under	the law	of the countr	ry in which	it's or	ganized	d? . 🕨	► LIM	ITED PA	RTNE	RSHIP			
10a	Does t	he filer have	an interest in the foreign	n partner	ship, or an in	terest indire	ectly the	rough t	he foreign	partner	ship, that	's a se	parate			
	unit un	der Reg. 1.1	503(d)-1(b)(4) or part of	a combin	ed separate	unit under F	Reg. 1.1	1503(d)	-1(b)(4)(ii)?	If "No,'	' skip que	estion 1	10b ►	□ Y	es	No
b			eparate unit or combine				olidated	loss, a	s defined ir	n Reg. 1	1.1503(d)	-1(b)(5)	(ii)? ►	□ Y	es	No
11			ship meet both of the to so's total receipts for the				000)						
	2. The	value of the	e partnership's total as	sets át th	ne end of the			s than	\$1 million.	. }			. ▶	□ Y	es	No
			mplete Schedules L, Multies of perjury, I declare			le veture les	du ediner e		anvina aaba)	and atatam	nonto o	nd to th	o boot	of my	lmaudadaa
	ere Only re Filing	and belief, i	t is true, correct, and con	nplete. De	claration of pr											
This Fo	orm Itely and	intormation	of which preparer has an	y knowled	age.					L						
	th Your	Signatu	re of general partner or lir	mited liabi	lity company	member		Date								
	_		reparer's name	tou nabi	Preparer's si					Date		Check if PTIN				
Paid		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				Signature					self-employed					
•	oarer	Firm's name	· •		ı		Firm's EIN ▶									
ose	Only		's address >					Phone no.								

Form 8865 (2018)

Constitution of the second	edule	Constructive Ownership of box b, enter the name, addr interest you constructively or	ess, and U.S. 1	taxpayer ider ctions.	ntifica	ation number (if any)			ou c	
5		a 🗸 Owns a direct interest		b □ (Owns a	a constructive inte	erest	Che	eck if	Che	ck if
i n		Name	Ac	ddress	8	Identification nun	nber (if ar	ny) for	eign rson	dire	ect
Sch	edule	A-1 Certain Partners of Foreign	n Partnership	(see instructi	ons)			ž			
0		Name	Ac	ddress		Identificati	i <mark>on nu</mark> mb	er (if any)		Che fore pen	eign
Sche	edule	A-2 Foreign Partners of Section	n 721(c) Partn	ership (see i	nstru	ctions)				0	
	e of forei		Country of organization	U.S. taxpay	/er	Check if related to		Percentage intere			
F	partner		(if any)	(if any)		U.S. transferor	Ca	pital		Profits	
								<u>%</u>			%
Door	the ne	artnership have any other foreign perso	n an a direct par	tnor?				%	Yes		% No
	edule		Il partnerships	(foreign or d					nersh		vns a
		Name	Ac	ddress		(if any)		income or		fore partne	
		clude only trade or business income and		1a through 22	belov 1a	w. See the instruc	ctions fo	or more in	format	tion.	
Income	2 3 4 5 6	Cost of goods sold									
	7 8	Other income (loss) (attach statement) Total income (loss). Combine lines 3					: :	7 8			
ations)	9	Salaries and wages (other than to part Guaranteed payments to partners .	tners) (less empl	oyment credits	s) . 			9			
Deductions (see instructions for limitations)	11 12 13	Repairs and maintenance Bad debts					[11 12 13			
instructio	14 15 16a	Taxes and licenses				, .		14 15			
ees) Suc	b 17	Less depreciation reported elsewhere Depletion (Don't deduct oil and gas d	on return		16b			16c 17			
ductio	18 19	Retirement plans, etc					[18 19			
٥	20 21 22	Other deductions (attach statement) Total deductions. Add the amounts s Ordinary business income (loss) from	shown in the far r	right column fo	or line	s 9 through 20		20 21 22			
ent	23 24	Interest due under the look-back method interest due under the look-back method interest due under the look-back method in the	697)	23 24							
Tax and Payment	25 26	BBA AAR imputed underpayment (see Other taxes (see instructions)					[25 26			
x and	27 28 29	Total balance due. Add lines 23 throup Payment (see instructions) Amount owed. If line 28 is smaller that					[27 28 29			
Ta	30	Overpayment. If line 28 is larger than						30			

Form 8865 (2018) Page **3**

Sched	lule 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	3c									
45-047	4	Guaranteed payments	4									
(SS	5	Interest income	5									
ö	6	Dividends and dividend equivalents: a Ordinary dividends	6a									
=		b Qualified dividends 6b	-									
Ĕ		c Dividend equivalents 6c										
Income (Loss)	7	Royalties	7									
드	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									
	_		94									
	b	Collectibles (28%) gain (loss)										
	C 10		10									
	10	Net section 1231 gain (loss) (attach Form 4797)	10									
(0	11	Other income (loss) (see instructions) Type ► Section 170 deduction (attack Form 4562)	11									
Deductions	12	Section 179 deduction (attach Form 4562)	12									
ŧ	13a	Contributions	13a									
ğ	b	Investment interest expense	13b									
ě	C	Section 59(e)(2) expenditures: (1) Type ► (2) Amount ►	13c(2)									
		Other deductions (see instructions) Type ►	13d									
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a									
Self- mplo ment	b	Gross farming or fishing income	14b									
ш		Gross nonfarm income	14c									
	15a	Low-income housing credit (section 42(j)(5))	15a									
ţ	b	Low-income housing credit (other)	15b									
Credits	C	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c									
	d	Other rental real estate credits (see instructions) Type										
	e	Other rental credits (see instructions) Type ▶ The second in the seco	15e									
	f	Other credits (see instructions) Name of country or U.S. possession ►	151									
	16a b	Name of country or U.S. possession ► Gross income from all sources	16b									
	C		16c									
ns	·	Gross income sourced at partner level										
ctions	d	Section 951A category ►e Foreign branch category ►	16e									
	f	Passive category ► g General category ► h Other (attach statement) ►	16h									
Foreign Transa	•	Deductions allocated and apportioned at partner level	10.1									
Ľa	i	Interest expense ▶ j Other	16j									
ב		Deductions allocated and apportioned at partnership level to foreign source income										
<u>eig</u>	k	Section 951A category ► I Foreign branch category	161									
o <u>r</u> e	m	Passive category ► o Other (attach statement) ►	160									
ш	р	Total foreign taxes (check one): ▶ □ Paid □ Accrued	16p									
	q	Reduction in taxes available for credit (attach statement)	16g									
	r	Other foreign tax information (attach statement)	.34									
	17a	Post-1986 depreciation adjustment	17a									
Tay ns	b	Adjusted gain or loss	17b									
ati ter	c	Depletion (other than oil and gas)	17c									
Alternative Minimum Tax (AMT) Items	d	Oil, gas, and geothermal properties—gross income	17d									
A ii A	e	Oil, gas, and geothermal properties—deductions	17e									
`∑ S	f	Other AMT items (attach statement)	17f									
_	18a	Tax-exempt interest income	18a									
. <u>ō</u>		Other tax-exempt income	18b									
Jat	c	Nondeductible expenses	18c									
Ĕ	19a	Distributions of cash and marketable securities	19a									
Other Information	b	Distributions of other property	19b									
<u>_</u>	20a	Investment income	20a									
ţ	b	Investment expenses	20b									
ō		Other items and amounts (attach statement)										

Page 4

Sche	edule L Balance Sheets per Books. (No	t required if Item	H11, page 1, is a	nswered "Yes.")	
		Beginnin	g of tax year	End of ta	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)			8	
9a	Buildings and other depreciable assets				
b	Less accumulated depreciation				
10a	Depletable assets				
b	Less accumulated depletion				
11	Land (net of any amortization)				
12a	Intangible assets (amortizable only)				
b	Less accumulated amortization				
13	Other assets (attach statement)				
14	Total assets				
	Liabilities and Capital				
15	Accounts payable				
16	Mortgages, notes, bonds payable in less than 1 year				
17	Other current liabilities (attach statement) .				
18	All nonrecourse loans				
19a	Loans from partners (or persons related to partners)				
b	Mortgages, notes, bonds payable in 1 year or more				
20	Other liabilities (attach statement)				
21	Partners' capital accounts				
22	Total liabilities and capital				

Form **8865** (2018)

Form 8	865 (2018)							Page 5
Sche	edule M	Balance Sheets for	r Interest Allocation	1		2		
						(a) Beginning of tax year	(b) End of tax year	
1	Total U.S. assets					2		32
2	Total foreign assets:							
а								
b	General category							
C	Other (attach	n statement)						
Sch	edule M-1	Reconciliation of H11, page 1, is ans	Income (Loss) per	Books	Witl	n Income (Loss) per Return	n. (Not required in	f Item
1	Net income	(loss) per books .		6		ome recorded on books this		
	Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,			\dashv		year not included on ledule K, lines 1 through 11		
2						nize):		
	and 11 not		a		-exempt interest \$			
	this tax year							
	\$			7	Dec	luctions included on Schedule		
3		payments (other		╗.		nes 1 through 13d, and 16p not		
		nsurance)				rged against book income this		
4	Expenses recorded on books					year (itemize):		
		ar not included on		а	Dep	preciation \$		
		K, lines 1 through						
	13d, and 16							
а	Depreciation							
b	Travel and e	ntertainment \$		8		l lines 6 and 7		
_	Alli	Add lines 1 through 4		9		ome (loss). Subtract line 8		
			re! Canital Assaurt	o (Not	fror	n line 5 ired if Item H11, page 1, is ar	anyored "Vee "\	
Schi 1		eginning of tax year	is Capital Account	5. (NOT		rred if item HTT, page T, is an	iswered res.)	1
2	Capital conti			⊢ °	DIS	b Property		
2	a Cash		7	Oth	er decreases (itemize): \$			
		b Property		⊣ ′				
3	Net income ((loss) per books .		\dashv				
4		ses (itemize): \$						
•				8	Add	l lines 6 and 7		+-
				9		ance at end of tax year.		\dagger
5	Add lines 1 t	through 4				stract line 8 from line 5		

Form **8865** (2018)

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	Commissions received				
5	Rents, royalties, and license fees received				
6	Distributions received				
7	Interest received				
8	Other				
9	Add lines 1 through 8				
10	Purchases of inventory				
11	Purchases of tangible property other than inventory				
12	Purchases of property rights (patents, trademarks, etc.)				
13	Compensation paid for technical, managerial, engineering, construction, or like services				
14	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
17	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance during the tax year). See instructions				
21	Amounts loaned (enter the maximum loan balance during the tax year). See instructions				

Form **8865** (2018)

Page 6

SCHEDULE O (Form 8865)

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

Transfer of Property to a Foreign Partnership (Under Section 6038B)

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

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

OMB No. 1545-1668

Name of transferor LUMINA FOUNDATIO	ON FOR EDUCA	ATION, INC.				Filer's identifying nur	mber 813228
Name of foreign partners GENERATION	hip		IONS ELIND II	EIN (if any)	17	Reference ID numbe	r (see instructions) E3228
1a Is the partne 1.721(c)-1T(l b If "Yes," was 2 Was any inta time thereaft	ership a section b)(14))? See in the gain defer angible proper ter, a platform	n 721(c) partn structions . ral method app ty transferred	ership (as defined in	cognition of gain up cipated to be, at the	on the contribution time of the	n	☐ Yes ☑ No ☐ Yes ☐ No
Trullor.	(a)	(b)	(c)	(d)	(e)	(f)	(g)
Type of property	Date of transfer	Description of property	Fair market value on date of transfer	Cost or other basis	Recovery peri	od Section 704(c) allocation method	Gain recognized on transfer
Cash	VARIOUS		753,320				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			753,320		0		0
3 Enter the tra Supplemental Info			et in the partnership		nsfer 2.3450	% (b) After the	transfer 0.0000 %
Part II Dispos	itions Repor	table Under S	Section 6038B				
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
raitiii	•		schedule subject to	-	under section	on 904(f)(3) or	☐ Yes ☑ No

8865

Department of the Treasury

Internal Revenue Service

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

Attach to your tax return.

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

beginning **JUN 01** , 2018, and ending **DEC 31** OMB No. 1545-1668

20

Sequence No. 118

Attachment

Filer's identification number Name of person filing this return LUMINA FOUNDATION FOR EDUCATION, INC. 35-1813228 Filer's address (if you aren't filing this form with your tax return) A Category of filer (see Categories of Filers in the instructions and check applicable box(es)): 4 3 🗸 **JAN 01 DEC 31** B Filer's tax year beginning . 20 , and ending C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Е Check if any excepted specified foreign financial assets are reported on this form. See instructions F Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Category 1 Category 2 Constructive owner Name and address of foreign partnership 2(a) EIN (if any) LIME ROCK PARTNERS IV AF, LP 98-1422853 % LIME ROCK MANAGEMENT, LP 2(b) Reference ID number (see instructions) 274 RIVERSIDE AVE, 3RD FLOOR WESTPORT, CT 06880 3 Country under whose laws organized CAYMAN ISLANDS Date of 5 Principal place of 6 Principal business 7 Principal business 8a Functional currency 8b Exchange rate activity code number activity organization business (see instructions) **CAYMAN ISLANDS** 523900 **INVESTING US DOLLAR** 4/17/2018 Provide the following information for the foreign partnership's tax year: Name, address, and identification number of agent (if any) in the 2 Check if the foreign partnership must file: 1 United States ✓ Form 1042 ✓ Form 8804 ✓ Form 1065 N/A Service Center where Form 1065 is filed: E-FILE 3 Name and address of foreign partnership's agent in country of 4 Name and address of person(s) with custody of the books and records of the organization, if any foreign partnership, and the location of such books and records, if different LIME ROCK MANAGEMENT, LP, 274 RIVERSIDE AVENUE. 3RD N/A FLOOR, WESTPORT, CT 06880 5 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not ☐ Yes ✓ No allowed under section 267A? See instructions If "Yes," enter the total amount of the disallowed deductions . . . Yes ✓ No 6 Is the partnership a section 721(c) partnership, as defined in Temporary Regulations section 1.721(c)-1T(b)(14)? . . . 7 Were any special allocations made by the foreign partnership? Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities 8 (FDEs) and Foreign Branches (FBs), attached to this return. See instructions How is this partnership classified under the law of the country in which it's organized? . ▶ LIMITED PARTNERSHIP 9 Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate 10a unit under Reg. 1.1503(d)-1(b)(4) or part of a combined separate unit under Reg. 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b ▶ ☐ Yes ☐ No If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Reg. 1.1503(d)-1(b)(5)(ii)? ▶ b 11 Does this partnership meet **both** of the following requirements? The partnership's total receipts for the tax year were less than \$250,000. Yes No 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. If "Yes," don't complete Schedules L, M-1, and M-2. Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge Sign Here Only and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on al if You're Filing information of which preparer has any knowledge. This Form **Not With Your** Tax Return. Signature of general partner or limited liability company member Date Print/Type preparer's name Date PTIN Preparer's signature Check if Paid self-employed Preparer Firm's EIN ▶ Firm's name ▶ Use Only Firm's address ▶ Phone no.

ALTON PHILIPPE	edule		ess, and U.S. t	axpayer ider					
		a Owns a direct interest		b 🗆 (Owns a	a constructive interes	est		
		Name	Ad	dress		Identification number (if any)		Check if foreign person	Check if direct partner
Sche	edule	A-1 Certain Partners of Foreign	n Partnership ((see instructi	ons)		-		
2		Name	Ad	Idress		Identificatio	n number (if a	any)	Check if foreign person
Sche	edule	A-2 Foreign Partners of Section	n 721(c) Partne	ership (see i	nstru	ctions)			
Name	of forei	an Addison	Country of	U.S. taxpay		Check if related to	Per	centage inter	est
	artner	Address	organization (if any)	identification nu (if any)	umber	U.S. transferor	Capital		Profits
								%	%
								%	%
Does	the pa	artnership have any other foreign perso	n as a direct part	tner?				. Yes	No No
Sche	edule	A-3 Affiliation Schedule. List a direct interest or indirectly or			omes	stic) in which the	e foreign	partnersh	
		Name	Ad	Idress		EIN (if any)		al ordinary me or loss	Check if foreign partnership
(SEE	STATE	MENT)							
Cob	- dudo	D. Income Statement Trade	au Duainasa I						
	edule	Income Statement—Trade lude only trade or business income and e			holos	v. Coo the inetruet	iona for ma	ro informa	tion
Cauti	-			ra through 22	1 -	v. See the instruct	ions for mo	ore informa	tion.
	1a	Gross receipts or sales			1a		4.		
	ь	Less returns and allowances			1b		1c		0
Ф	2	Cost of goods sold	. 2		0				
ncome	3	Gross profit. Subtract line 2 from line 1c							0
ဋ	4		. 4						
=	5	Net farm profit (loss) (attach Schedule F (Form 1040))							
	6		•				. 6		
	7	Other income (loss) (attach statement)					. —		0
	8 9	Total income (loss). Combine lines 3					. 8		0
(su	10	Salaries and wages (other than to part					. 10		
tatio	11	Guaranteed payments to partners . Repairs and maintenance							
Ē	12	Bad debts							
for	13	Rent							
ions	14	Taxes and licenses					-		
Deductions (see instructions for limitations)	15	Interest (see instructions)					. 15		
inst	16a	Depreciation (if required, attach Form					. 13		
ees)	b	Less depreciation reported elsewhere					16c		0
S	17	Depletion (Don't deduct oil and gas de							
<u>ō</u>	18	Retirement plans, etc							
텋	19	Employee benefit programs							
þ	20	Other deductions (attach statement)							
۵	21	Total deductions. Add the amounts s							0
	22	Ordinary business income (loss) from							0
	23	Interest due under the look-back meth							
Tax and Payment	24	Interest due under the look-back meth	. —						
Ě	25		AAR imputed underpayment (see instructions)						
a	26	Other taxes (see instructions)							
Ъ	27	Total balance due. Add lines 23 throu							0
an	28	Payment (see instructions)							
×	29	Amount owed. If line 28 is smaller that							
Ë	30	Overpayment. If line 28 is larger than							

Form 8865 (2018) Page **3**

Sched	ule K	Partners' Distributive Share Items		Total amount
	1	Ordinary business income (loss) (page 2, line 22)	1	0
	2	Net rental real estate income (loss) (attach Form 8825)	2	
		Other gross rental income (loss)		
	b	Expenses from other rental activities (attach statement) 3b	8	
		Other net rental income (loss). Subtract line 3b from line 3a	3c	0
	4	Guaranteed payments	4	
(SS	5	Interest income	5	+
Income (Loss)	6	Dividends and dividend equivalents: a Ordinary dividends	6a	+
=	U	b Qualified dividends 6b	Va	
Ĕ		c Dividend equivalents 6c	-	
8	7	THE TABLE	7	
르	8	Royalties	8	9
	_		9a	
	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) 9c	10	
	10	Net section 1231 gain (loss) (attach Form 4797)	10	
	11	Other income (loss) (see instructions) Type ►	11	
Deductions	12	Section 179 deduction (attach Form 4562)	12	
뜑	13a	Contributions	13a	
<u>3</u>		Investment interest expense	13b	
eq		Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)	
		Other deductions (see instructions) Type ►	13d	
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a	
Self- mplo ment		Gross farming or fishing income	14b	
<u>ū</u>		Gross nonfarm income	14c	
	15a	Low-income housing credit (section 42(j)(5))	15a	
छ		Low-income housing credit (other)	15b	
Credits		Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c	
ğ		Other rental real estate credits (see instructions) Type ▶	15d	
•		Other rental credits (see instructions) Type ▶	15e	
	f	Other credits (see instructions) Type ►	15f	
	16a	Name of country or U.S. possession ▶		
	b	Gross income from all sources	16b	
တ	C	Gross income sourced at partner level	16c	
ctions		Foreign gross income sourced at partnership level		
	d	Section 951A category ▶ e Foreign branch category ▶	16e	
Sa	f	Passive category ► b Other (attach statement) ►	16h	
Foreign Transa		Deductions allocated and apportioned at partner level		
F	i	Interest expense ▶ j Other	16j	
g		Deductions allocated and apportioned at partnership level to foreign source income		
<u>ē</u>	k	Section 951A category ▶ I Foreign branch category ▶	16I	
윤	m	Passive category ► o Other (attach statement) ►	160	
	р	Total foreign taxes (check one): ▶ □ Paid □ Accrued	16p	
	q	Reduction in taxes available for credit (attach statement)	16q	
	r	Other foreign tax information (attach statement)		
. × o	17a	Post-1986 depreciation adjustment	17a	
Alternative Minimum Tay (AMT) Items	b	Adjusted gain or loss	17b	
um Ite	С	Depletion (other than oil and gas)	17c	
A i i f	d	Oil, gas, and geothermal properties—gross income	17d	
Alternative Minimum Tax (AMT) Items	е	Oil, gas, and geothermal properties—deductions	17e	
	f	Other AMT items (attach statement)	17f	
Ĕ	18a	Tax-exempt interest income	18a	
댩	b	Other tax-exempt income	18b	
Ĕ	C	Nondeductible expenses	18c	
<u>.</u>	19a	Distributions of cash and marketable securities	19a	
重	b	Distributions of other property	19b	
Other Information	20a	Investment income	20a	
Ę	b	Investment expenses	20b	
0	C	Other items and amounts (attach statement)		

Page 4

Sche	edule L Balance Sheets per Books. (No	t required if Item	H11, page 1, is ans	swered "Yes.")	
		Beginnin	g 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		0		0
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		0		0
10a	Depletable assets				
b	Less accumulated depletion		0		0
11	Land (net of any amortization)				
12a	Intangible assets (amortizable only)				
b	Less accumulated amortization		0		0
13	Other assets (attach statement)				
14	Total assets		0		0
	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		0		0

Sche	dule M Balance Sheets for	r Interest Allocation			Prog. 4.0 - 20 (2010)
				(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				
C	Other (attach statement)				
Sche	Reconciliation of H11, page 1, is ans	ncome (Loss) per B	Books W	ith Income (Loss) per Retur	n. (Not required if Item
1	Net income (loss) per books .		A-975	ncome recorded on books this ax year not included on	
2	Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11 not recorded on books		(i	Schedule K, lines 1 through 11 temize): fax-exempt interest \$	
	this tax year (itemize): \$		7	Deductions included on Schedule	0
3	Guaranteed payments (other than health insurance)		, k	f, lines 1 through 13d, and 16p not harged against book income this	
4	Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 16p (itemize):		a [ax year (itemize): Depreciation \$	
а					0
b	Travel and entertainment \$		8 A	add lines 6 and 7	0
		0		ncome (loss). Subtract line 8	
5	Add lines 1 through 4 edule M-2 Analysis of Partne	0	f	rom line 5	0
Sche		rs' Capital Accounts			nswered "Yes.")
1	Balance at beginning of tax year		6 [Distributions: a Cash	
2	Capital contributed:			b Property	
	a Cash		7 (Other decreases (itemize): \$	
	b Property				
3	Net income (loss) per books .				
4	Other increases (itemize): \$				
			_	add lines 6 and 7	0
			I	Balance at end of tax year.	
5	Add lines 1 through 4		5	Subtract line 8 from line 5	0

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	Commissions received				
5	Rents, royalties, and license fees received				
6	Distributions received				
7	Interest received				
8	Other				
9	Add lines 1 through 8				
10	Purchases of inventory				
11	Purchases of tangible property other than inventory				
12	Purchases of property rights (patents, trademarks, etc.)				
13	Compensation paid for technical, managerial, engineering, construction, or like services				
14	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
17	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance during the tax year). See instructions				
21	Amounts loaned (enter the maximum loan balance during the tax year). See instructions				

Form **8865** (2018)

Page 6

SCHEDULE O (Form 8865)

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

Transfer of Property to a Foreign Partnership (Under Section 6038B)

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

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

OMB No. 1545-1668

Name of transferor			3.g0V/r-0/1110000 101 1	istractions and the	ratest inform	Filer's identifying nu			
Name of foreign partners		CATION, INC.		EIN (if any)			313228		
LIME ROCK PA	No. of the last of	IV AF, LP		98-14228	853	Reference ID number (see instructions)			
1.721(c)-1T(l b If "Yes," was 2 Was any inta	b)(14))? See in the gain defeatingible prope	nstructions . rral method ap erty transferred	nership (as defined in the second considered or antic	cognition of gain up	oon the contrib ne time of the	oution of property? transfer or at any	☐ Yes ☐ No		
		ole Under Sec	as defined in Regula	ations section 1.48	32-7(C)(1)? .		☐ Yes ✓ No		
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery peri	(f) Section 704(c) allocation method	(g) Gain recognized on transfer		
Cash	(SEE STATEMENT)		(SEE STATEMENT)						
Stock, notes receivable and payable, and other securities									
Inventory									
Tangible property used in trade or business									
Intangible property described in section 197(f)(9)									
Intangible property, other than intangible property described in section 197(f)(9)									
Other property									
Totals			4,943,748		0		0		
3 Enter the tra Supplemental Info (SEE STATEMENT)			st in the partnership Reported (see instru		ansfer 0.0000	% (b) After the	transfer 0.2587 %		
Part II Dispos	itions Repo	table Under	Section 6038B						
(a) Type of property	(b) Date of original transfe	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner		
le any	transfer ren	orted on this	schedule subject to	gain recognition	under section	n 904(f)(3) or			
r al v III	904(f)(5)(F)?		· · · · · · ·	-			☐ Yes 🗸 No		

Affiliation Schedule (continued)

Name	Address	EIN (if any)	Total ordinary income Check if foreign or loss partnership	Check if foreign partnership
LR-CROWNROCK IV AF HOLDINGS LP	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	83-0793404		
CROWNROCK HOLDINGS LP	P.O. BOX 52287 MIDLAND, TX, 79710	82-3789749		
CROWNROCK HOLDINGS GP LLC	P.O. BOX 52287 MIDLAND, TX, 79710	82-3789638		
LRP IVC HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	98-1414477		1
DHS ENERGY SERVICES LIMITED	KINGSTON CHAMBERS, PO BOX 173 ROAD TOWN, VIRGIN ISLANDS, VIRGIN ISLANDS	98-1032796		1
LR-CROWNROCK HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880			

Part I. Transfers Reportable Under Section 6038B (continued)

(g) Gain recognized on transfer N/A N/A (f) Section 704(c) allocation method N/A NA (e) Recovery period ¥ × (c) Fair market value on date of transfer ≰ Ž 4,911,911 31,837 (b) Description of property CASH CASH (a) Date of transfer 12/24/2018 6/22/2018 Type of property CASH CASH

Department of the Treasury

Internal Revenue Service

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

Information furnished for the foreign partnership's tax year

beginning **JAN 01** , 2018, and ending OMB No. 1545-1668

Attachment Sequence No. 118

		filing this retu				Filer's identification number 35-1813228										
-	MARKET SEC		OR EDUCATION			18				D. 2000 11000	Delica del Composito del Compo					
Filer's	address (i	if you aren't fil	ling this form with ye	our tax return		A Catego		r (see Categor	ries of File 3 ✓	4	ructions and	check ap	plicabl	le box(es)):		
						The second second	-10 	A.9 .—.	CCC VANDAGE CO.	Landa Valley		DEC	24	00 10		
С	Filor's s	share of liab	lities: Nonrecours	20.4				beginning Jourse financi	AN 01	,20 18 ,	and ending Other		31 ,	20 18		
D	ALCOHOLOGY		of a consolidated		not the parent	The second		The second secon		the parent	-	Φ		<u> </u>		
	Name	amember	oi a consolidated	group but i	iot the parent	i, eriter trie	TOILOW	EIN	ni about	ule parent.						
	Address	s						Liiv						-		
E			ted specified fore	eign financia	l assets are re	eported on	this fo	rm. See instru	uctions					. \Box		
F	Informa	tion about o	ertain other partr	ners (see ins	tructions)	•										
		(1) Name			(2) Addres	ss (3) Identification numb				er	(4) Check applicable box(es)					
		(i) Name			(Z) Addres	33		(b) Identificat	donnania	Categor	ry 1 Cat	egory 2	Constr	uctive owner		
G1			of foreign partne	rship				2(a) EIN (if	any)							
	LIME ROCK PARTNERS VI, LP LIME ROCK MANAGEMENT LP										027307					
	274 RIVERSIDE AVENUE, 3RD FLOOR							2(b) Refere	ence ID r	number (see	e instructio	ns)				
WES	TPORT,	CT 06880						2 Country								
								CAYMAN I			organized					
4	Date of 5 Principal place of 6 Principal business			7 Pri	ncipal busine		Functional	currency	8b Exc	chang	e rate					
	organiz	ation	business					ivity			(see instruction					
	12/14/2	12/14/2011 CAYMAN ISLANDS 523900)	INVE	STMENTS	US	DOLLAR		N/A					
н	Provide	the followir	ng information for	the foreign	partnership's	tax year:			'			'				
1			d identification no	umber of ag	ent (if any) in t	the	2 (heck if the fo	oreign pa	rtnership m	nust file:					
	United	States					٠ ا	/ Form 1042	_	orm 8804	✓ Forr	n 1065				
								Service Center	where Fo	m 1065 is file	ed:					
								E-FILE		()						
3		and address ation, if any	of foreign partne	ership's agei	nt in country o	of		ame and addre								
	o.ga	, u,						E ROCK MAI								
						FLOOR, WESTPORT, CT 06880										
5	During	the tay ve	ar, did the foreig	an partnerel	ain nay or ac	orue any	interes	or royalty f	or which	the deduc	etion is no	.+				
•			tion 267A? See i							· · ·	•	L 🗆 Y	es 🗸	∕ No		
	If "Yes	s," enter the	total amount of t	he disallowe	ed deductions	s					🕨	\$				
6	Is the	partnership	a section 721(c)	partnership,	as defined in	Temporar	y Regu	lations sectio	n 1.721(c)-1T(b)(14)	? 🕨	► Y	es 🗸	∕ No		
7	Were	any special	allocations made	by the forei	gn partnershi	p?					🕨	- □ Y	es 🗸	∕ No		
8	Enter	the number	of Forms 8858,	Information	n Return of U	J.S. Perso	ns Wit	h Respect to	Foreig	Disregard	led Entitie	S				
	•		n Branches (FBs)								>					
9			rship classified u			•				MITED PAF						
10a			an interest in the f	• .	• •		•	•	•					7 N		
_		•	503(d)-1(b)(4) or pa				•						_	」No □ No		
ь 11			eparate unit or con ship meet both of				nuateu	ioss, as deline	ea iii neg	. 1.1503(u)-1	(D)(S)(II)?	r	es	_ No		
	1. The	partnership	's total receipts f	or the tax ye	ear were less	than \$250,			_			- 🗆 v	es	No		
			partnership's tot nplete Schedules			e tax year v	was les	s than \$1 mill	lion.			•	_			
Sign He	ere Only	Under pena	Ities of perjury, I dea	clare that I ha	ve examined thi											
	e Filing		t is true, correct, an of which preparer h			reparer (othe	er than (eneral partner	or limited	liability com	pany memb	er) is base	ed on a	ll .		
Separa	tely and th Your			•	-											
Tax Re		Signatu	re of general partne	r or limited lia	bility company	member				Date						
Paid	ı	Print/Type p	reparer's name		Preparer's si	ignature			Da	е	Check	if PT	IN			
	oarer										self-empl	oyed				
	Only	Firm's name	•								Firm's EI	1				
	•	Firm's addre	ess ►								Phone no		Phone no.			

Section of the second	edule		ess, and U.S. t	axpayer ider					
		a Owns a direct interest		b 🗆 (Owns a	a constructive inter	est		8
		Name	Ad	ddress		Identification number (if any)		Check if foreign person	Check if direct partner
Sche	edule	A-1 Certain Partners of Foreign	n Partnership ((see instructi	ons)				Check if
		Name	Ac	ddress		Identification	on number (if	any)	Check if foreign person
Sche	edule	A-2 Foreign Partners of Section	n 721(c) Partn	ership (see i	nstru	ctions)			
Name	of forei	gn	Country of	U.S. taxpay		Check if related to	Pe	rcentage inter	est
	artner	Address	organization (if any)	identification no (if any)	umber	U.S. transferor	Capital		Profits
			(**************************************	(* 22.7)				%	%
								%	%
Does	the pa	artnership have any other foreign perso	n as a direct par	tner?				. Yes	No No
Sche	edule	direct interest or indirectly or	wns a 10% inte	erest.	omes	etic) in which th		partnersh	Check if
(SEE	STATE	Name MENT)	Ac	Idress		(if any)		ome or loss	foreign partnership
(OLL	OIAIL	INCIVI)							
Sch	edule	B Income Statement—Trade	or Business I	ncome					
		lude only trade or business income and			helov	v See the instruct	tions for m	ore informs	tion
Vauti	-		-	ra tillough 22	1a	v. Oce the mande	10113 101 111		idon.
	1a	Gross receipts or sales	1c	1					
	ь								
Φ	2	Cost of goods sold							
Ě	3	Gross profit. Subtract line 2 from line 1c							
ncome	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)							
프	5	Net farm profit (loss) (attach Schedule F (Form 1040))							
	6	Net gain (loss) from Form 4797, Part II	•	•			. 6		
	7	Other income (loss) (attach statement)					. 7		
	8	Total income (loss). Combine lines 3					. 8		
(S)	9	Salaries and wages (other than to part					. 9		
tion	10	Guaranteed payments to partners .					. 10		
nita	11	Repairs and maintenance					. 11		
≣	12	Bad debts					. 12		
ns fe	13	Rent					. 13		
Deductions (see instructions for limitations)	14	Taxes and licenses					+		
stru	15	Interest (see instructions)					. 15		
ë	16a	Depreciation (if required, attach Form							
(se	b	Less depreciation reported elsewhere	on return		16b		16c		
us	17	Depletion (Don't deduct oil and gas de					. 17		
Ę	18	Retirement plans, etc					. 18		
nc	19	Employee benefit programs							
eq	20	Other deductions (attach statement)							
۵	21	Total deductions. Add the amounts s							
	22	Ordinary business income (loss) from							
	23	Interest due under the look-back meth							
Tax and Payment	24	Interest due under the look-back meth	-						
Ē	25	BBA AAR imputed underpayment (see							
a)	26	Other taxes (see instructions)							
Д Т	27	Total balance due. Add lines 23 throu							
ğ	28	Payment (see instructions)							
×	29	Amount owed. If line 28 is smaller that							
Ľ	30	Overpayment. If line 28 is larger than					-		
		paje. a n mo Lo lo largor triari	= 1, 011101 01	J. Paymont		<u> </u>	. 00		

Form 8865 (2018) Page **3**

Sched	ule 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		
		Other gross rental income (loss)			_
	b	Expenses from other rental activities (attach statement) 3b	65		
		Other net rental income (loss). Subtract line 3b from line 3a	3c		
45-28-7		Guaranteed payments	4	8	7
SS)		Interest income	5		_
Š		Dividends and dividend equivalents: a Ordinary dividends	6a	7	-
Income (Loss)	970	b Qualified dividends 6b			-
Ě		c Dividend equivalents 6c	_		
8	7	Royalties	7		
<u>-</u>		Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8	0	7
		Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a		_
		Collectibles (28%) gain (loss)	Ju		_
		Unrecaptured section 1250 gain (attach statement) 9c			
		Net section 1231 gain (loss) (attach Form 4797)	10		
		Other income (loss) (see instructions) Type ▶	11		_
S		Section 179 deduction (attach Form 4562)	12		_
ou	13a	Contributions	13a		_
Deductions		Investment interest expense	13b		_
ğ		Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)		_
De		Other deductions (see instructions) Type ▶	13d		_
١		Net earnings (loss) from self-employment	14a		_
Self- Employ- ment		Gross farming or fishing income	14b		_
SEE		Gross nonfarm income	14c		_
	15a	Low-income housing credit (section 42(j)(5))	15a		_
"	b	Low-income housing credit (other)	15b		_
Credits		Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c		_
<u>e</u>	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 ▶			
	b	Gross income from all sources	16b		
"	C	Gross income sourced at partner level	16c		
ctions		Foreign gross income sourced at partnership level			
ŧ	d	Section 951A category ► e Foreign branch category ►	16e		
	f	Passive category ► g General category ► h Other (attach statement) ►	16h		
Foreign Transa		Deductions allocated and apportioned at partner level			
Ĕ	i	Interest expense ▶ j Other	16j		
gu		Deductions allocated and apportioned at partnership level to foreign source income			
ē		Section 951A category ► I Foreign branch category ►	16 l		_
ß		Passive category ► o Other (attach statement) ►	160		_
	р	Total foreign taxes (check one): ▶ □ Paid □ Accrued	16p		_
	q	Reduction in taxes available for credit (attach statement)	16q		
		Other foreign tax information (attach statement)			
e X	17a	Post-1986 depreciation adjustment	17a		_
tive E T	b	Adjusted gain or loss	17b		_
ur Ur	C	Depletion (other than oil and gas)	17c		_
Alternative Minimum Tax (AMT) Items		Oil, gas, and geothermal properties—gross income	17d		_
₹₹₹		Oil, gas, and geothermal properties—deductions	17e		_
		Other AMT items (attach statement)	17f		_
ou		Tax-exempt interest income	18a		_
ati		Other tax-exempt income	18b		_
E		Nondeductible expenses	18c		_
ıfο		Distributions of cash and marketable securities	19a		_
<u>-</u>		Distributions of other property	19b 20a		_
Other Information		Investment expenses	20a		_
ð		Other items and amounts (attach statement)	200		

Page 4

Sche	edule L Balance Sheets per Books. (No	t required if Item I	H11, page 1, is a	nswered "Yes.")	
*		Beginning	of tax year	End of	tax year
	Assets	(a)	(b)	(c)	(d)
1	Cash				
2a	Trade notes and accounts receivable			7	
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)		8	, (A	
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				

Sche	dule M Balance Sheets for Inter	st Allocation	
		(a) Beginning of tax year	(b) End of tax year
1	Total U.S. assets		
2	Total foreign assets:	S 054 0551 S 50 W 05 054 0551	
а	Passive category		
b	General category		
C	Other (attach statement)		
Sche	Reconciliation of Incom H11, page 1, is answered	(Loss) per Books With Income (Loss) per Retur	rn. (Not required if Item
1	Net income (loss) per books .	6 Income recorded on books this tax year not included on	2
2	Income included on Schedule K,	Schedule K, lines 1 through 11	
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,	(itemize):	
	and 11 not recorded on books	a Tax-exempt interest \$	
	this tax year (itemize):		
	\$	7 Deductions included on Schedule	
3	Guaranteed payments (other	K, lines 1 through 13d, and 16p not	
	than health insurance)	charged against book income this	
4	Expenses recorded on books	tax year (itemize):	
	this tax year not included on	a Depreciation \$	
	Schedule K, lines 1 through		
	13d, and 16p (itemize):		
a			
b	Travel and entertainment \$	8 Add lines 6 and 7	
_	Add lines of there is a	9 Income (loss). Subtract line 8	
9 Sobi	Add lines 1 through 4	from line 5	nowored "Vee "\
1	Balance at beginning of tax year	6 Distributions: a Cash	answered res.)
2	Capital contributed:	b Property	
_	a Cash	7 Other decreases (itemize): \$	
	b Property		
3	Net income (loss) per books .		
4	Other increases (itemize): \$		
•		8 Add lines 6 and 7	
		9 Balance at end of tax year.	
5	Add lines 1 through 4	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	Commissions received				
5	Rents, royalties, and license fees received				
6	Distributions received				
7	Interest received				
8	Other				
9	Add lines 1 through 8				
10	Purchases of inventory				
11	Purchases of tangible property other than inventory				
12	Purchases of property rights (patents, trademarks, etc.)				
13	Compensation paid for technical, managerial, engineering, construction, or like services				
14	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
17	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance during the tax year). See instructions				
21	Amounts loaned (enter the maximum loan balance during the tax year). See instructions				

SCHEDULE O (Form 8865)

(Rev. December 2018)

Department of the Treasury
Internal Revenue Service

Transfer of Property to a Foreign Partnership (Under Section 6038B)

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

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

OMB No. 1545-1668

Internal Revenue Service	· ·	Go to www.irs	s.gov/Form8865 for it	nstructions and the	latest inform	ation.	
Name of transferor LUMINA FOUNDATION	ON FOR EDUCA	ATION, INC.				Filer's identifying nur 35-18	mber 313228
Name of foreign partners LIME ROCK PA	No. of the last way to be a second or the se	VI, L.P.		EIN (if any) 98-10273	307	Reference ID numbe	r (see instructions)
1a Is the partne 1.721(c)-1T(l b If "Yes," was 2 Was any inta time thereaft	ership a section b)(14))? See in the gain defer angible proper ter, a platform	n 721(c) partnostructions . ral method app ty transferred contribution a	ership (as defined in	ognition of gain up	oon the contrib ne time of the	oution of property? transfer or at any	
Part I Transf	ers Reportab	le Under Sect	tion 6038B				
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery per	iod (f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	VARIOUS		1,081,926				
Stock, notes receivable and payable, and other securities							
Inventory							
Tangible property used in trade or business							
Intangible property described in section 197(f)(9)							
Intangible property, other than intangible property described in section 197(f)(9)							
Other property							
Totals			1.081.926		0		0
	nsferor's perc	entage interes	st in the partnership		•	% (b) After the	
Supplemental Info				uctions):			
(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 repo		chedule subject to	gain recognition	under section	on 904(f)(3) or	☐ Yes ☑ No

Name	Address	EIN (if any)	Total ordinary income Check if foreign or loss	Check if foreign partnership
LR-SHELF DRILLING INTERNATIONAL, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	98-1065729		1
LR-AUGUSTUS HOLDINGS II, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	46-4182367		
AUGUSTUS ENERGY PARTNERS II HOLDING, LLC	2016 GRAND AVE, SUITE A BILLINGS, MT, 59102	46-4408588		5 9
AUGUSTUS ENERGY PARTNERS II, LLC	2016 GRAND AVE, SUITE A BILLINGS, MT, 59102	46-4181288		
LR-BATTLECAT HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	47-2127745		
BATTLECAT MANAGEMENT, LLC	11391 MEADOWGLEN LANE, SUITE D HOUSTON, TX, 77082	47-2327184	0	
BATTLECAT OIL & GAS HOLDINGS, LLC	11391 MEADOWGLEN LANE, SUITE D HOUSTON, TX, 77082	47-2326882		
LR-CAPSTONE HOLDINGS II, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	47-2023739		
CAPSTONE NATURAL RESOURCES HOLDINGS II, LLC	2250 EAST 73RD STREET, SUITE 500 TULSA, OK, 74136	47-2148719		
CAPSTONE NATURAL RESOURCES II, LLC	2250 EAST 73RD STREET, SUITE 500 TULSA, OK, 74136	47-2143795		
LR-CRM 2018 FUND VI HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	82-5352725	0	
LR-CROWNROCK MINERALS FUND VI HOLDINGS, LP	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	81-4469769		
LR-CRM HOLDINGS II, LP	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	81-4469413		
LR-CRM 2018 HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	82-5358943		
CRM 2018, L.P.	18 DESTA DR MIDLAND, TX, 79705	32-0572540		
CROWNROCK MINERALS, LP	PO BOX 51933 MIDLAND, TX, 79710	36-4832558		
LR-ENDURANCE HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	46-1547167		
ENDURANCE RESOURCES HOLDINGS, LLC	15455 N. DALLAS PARKWAY, SUITE 1050 ADDISON, TX, 75001	90-0917685		
ENDURANCE RESOURCES MANAGEMENT, LLC	15455 N. DALLAS PARKWAY, SUITE 1050 ADDISON, TX, 75001	61-1771629		
ENDURANCE RESOURCES, LLC	15455 N. DALLAS PARKWAY, SUITE 1050 ADDISON, TX, 75001	32-0291073		
LR-KSWE HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	47-2381277		
KSW ENVIRONMENTAL HOLDINGS, LLC	5800 E SKELLY DR, SUITE 300 TULSA, OK, 74135	47-3001987		
KSW ENVIRONMENTAL, LLC	5800 E SKELLY DR, SUITE 300 TULSA, OK, 74135	30-0747509		
LR-SDI GAS HOLDINGS, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	47-4497804		

Name	Address	EIN (if any)	Total ordinary income Check if foreign or loss	Check if foreign partnership
SDI GAS HOLDINGS LLC	130 MEADOW RIDGE ROAD MOUNT MORRIS, PA, 15349	47-4762248		
MILLENNIUM ENERGY SERVICES, LLC	130 MEADOW RIDGE ROAD MOUNT MORRIS, PA, 15349	81-4811032		
UNITED ELECTRICAL SERVICES, LLC	185 MIDSTREAM WAY JANE LEW, WV, 26378	82-3452650		
LR-VANTAGE HOLDINGS II, L.P.	274 RIVERSIDE AVENUE, 3RD FLOOR WESTPORT, CT, 06880	45-5591625		