Robert W. Woodruff Arts Center

Public Inspection Copy
For the Year Ended
May 31, 2023

TAX RETURNS



ROBERT W. WOODRUFF ARTS CENTER, INC. INSTRUCTIONS FOR FILING FORM 8879-TE IRS E-FILE SIGNATURE AUTHORIZATION FOR FORM 990 FOR THE YEAR ENDED MAY 31, 2023

THE ORIGINAL IRS E-FILE SIGNATURE AUTHORIZATION FORM SHOULD BE SIGNED (USE FULL NAME) AND DATED BY AN AUTHORIZED OFFICER OF THE ORGANIZATION.

RETURN YOUR SIGNED IRS E-FILE SIGNATURE AUTHORIZATION FORM 8879-TE TO:

SMITH & HOWARD ADVISORY, LLC 271 17TH STREET, NW SUITE 1600 ATLANTA GA 30363

THERE IS NO TAX DUE WITH THE FILING OF THIS RETURN.

AN ADDITIONAL COPY OF THE RETURN SHOULD BE FILED WITH: GEORGIA DEPARTMENT OF REVENUE P.O. BOX 740395
ATLANTA, GA 30374-0395

DO NOT SEPARATELY FILE FORM 990 WITH THE INTERNAL REVENUE SERVICE. DOING SO WILL DELAY THE PROCESSING OF YOUR RETURN. WE MUST RECEIVE YOUR SIGNED FORM BEFORE WE CAN ELECTRONICALLY TRANSMIT YOUR RETURN, WHICH IS DUE ON OR BEFORE APRIL 15, 2024. WE WOULD APPRECIATE YOU RETURNING THIS FORM AS SOON AS POSSIBLE AS THIS WILL EXPEDITE THE PROCESSING OF YOUR RETURN. THE INTERNAL REVENUE SERVICE WILL NOTIFY US WHEN YOUR RETURN IS ACCEPTED. YOUR RETURN IS NOT CONSIDERED FILED UNTIL THE INTERNAL REVENUE SERVICE CONFIRMS THEIR ACCEPTANCE, WHICH MAY OCCUR AFTER THE DUE DATE OF YOUR RETURN.

Payment/Deposit Information Report

Taxpayer Name: ROBERT W. WOODRUFF ARTS CENTER, INC.

Tax Juris.	Payment Deposit	Amount	Financial Institution Name	Account Type	Routing Number	Account Number	
ui 13.	Берозіі	Amount	i mandai mattation vame	Турс	Number	Account Humber	
				_			
	+						

Form 8879-TE

IRS e-file Signature Authorization for a Tax Exempt Entity For calendar year 2022, or fiscal year beginning 06/01/2022 and ending 05/31/2023

2022

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service

Do not send to the IRS. Keep for your records. Go to www.irs.gov/Form8879TE for the latest information.

1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the finance processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries are the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and electronic funds withdrawal. PIN: check one box only I authorize	d resolve issues related to if applicable, the consent to 1 7 2 3 6 as my signature Enter five numbers, but do not enter all zeros if the return is being filed with a state entioned ERO to enter my PIN on the ure on the tax year 2022 electronically agency(ies) regulating charities as part 4/15/2024 eturn indicated above. I confirm that I
1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the finance processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries are the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and electronic funds withdrawal. PIN: check one box only I authorize	Information for Authorized IRS e-file
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1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the finance	
· · · · · · · · · · · · · · · · · · ·	
return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S.	· · · · · · · · · · · · · · · · · · ·
(direct debit) entry to the financial institution account indicated in the tax preparation software for payment of th	e federal taxes owed on this
acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate a	
intermediate service provider, transmitter, or electronic return originator (ERO) to send the return to the IRS and to	receive from the IRS (a) an
2022 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belie complete. I further declare that the amount in Part I above is the amount shown on the copy of the electronic returns.	
	e examined a copy of the
Under penalties of perjury, I declare that X I am an officer of the above entity or I am a person subjective to the state of the state	·
Part II Declaration and Signature Authorization of Officer or Person Subject to Tax	
10a Form 8038-CP check here b Amount of credit payment requested (Form 8038-CP, Part III	, line 22) •10b
9a Form 5330 check here b Tax due (Form 5330, Part II, line 19)	
8a Form 5227 check here b FMV of assets at end of tax year (Form 5227, Item D)	
7a Form 4720 check here b Total tax (Form 4720, Part III, line 1)	
6a Form 990-T check here b Total tax (Form 990-T, Part III, line 4)	
5a Form 8868 check here b Balance due (Form 8868, line 3c)	
4a Form 990-PF check here b Tax based on investment income (Form 990-PF, Part V, line s	
3a Form 1120-POL check here b Total tax (Form 1120-POL, line 22)	
2a Form 990-EZ check here b Total revenue, if any (Form 990-EZ, line 9)	
1a Form 990 check here X b Total revenue, if any (Form 990, Part VIII, column (A), line 12	99817852
applicable line below. Do not complete more than one line in Part I.	
5b, 6b, 7b, 8b, 9b, or 10b, whichever is applicable, blank (do not enter -0-). But, if you entered -0-	
CP and Form 5330 filers may enter dollars and cents. For all other forms, enter whole dollars only. If you 5a, 6a, 7a, 8a, 9a, or 10a below, and the amount on that line for the return being filed with this form was	
· · · · · · · · · · · · · · · · · · ·	•
Observation have fee the entire fee which was one wains this Fees 0070 TC and enter the continoble emous	
Part Type of Return and Return Information Check the box for the return for which you are using this Form 8879-TE and enter the applicable amount	
HALA MODDELMOG, PRESIDENT & CEO Part I Type of Return and Return Information	
Part I Type of Return and Return Information	58-0633971

Form 990

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except private foundations)

Do not enter social security numbers on this form as it may be made public.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2022

Open to Public Inspection

Department of the Treasury Internal Revenue Service

<u>A</u> F	or th	e 2022 cale	endar year, or tax year beginning 06/01/2022 and ending				
_			C Name of organization	·-	D Employe	r identificatio	n number
B 0	check if a	applicable.	ROBERT W. WOODRUFF ARTS CENTER, INC.				
	Addres	ss change	Doing business as		58-063	33971	
	Name	change	Number and street (or P.O. box if mail is not delivered to street address) Ro	om/suite	E Telephon	ne number	
	Initial i	return	1280 PEACHTREE ST NE		(404)	733-420	n
	ł						<u> </u>
\vdash	Amend	ied return					0.4.0
	Applica	ation pending		H(a) is the		- 1	
	J			subor	rdinates?	— ⊢ `	
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_					<u> </u>		
				formation: 196	5 M State	of legal domi	cile: GA
P	art I						
	1	Briefly des	scribe the organization's mission or most significant activities: $_$ <code>CHARITABLE</code> $_$ <code>AF</code>	RTS ORGANI	ZATION	TO INS	PIRE,
õ		CREATE	, SUPPORT AND CELEBRATE RENOWNED ARTS AND EDUCATION	V FOR DIVE	IRSE		
nau		AUDIEN	CES THROUGH OUR UNIQUE MODEL OF PARTNERSHIPS AND CO	OLLABORAT I	IONS.		
Ver	2	Check this	s box $igsqcup$ if the organization discontinued its operations or disposed of m	ore than 25%	of its n	net assets.	
ဖိ	3	Number of	f voting members of the governing body (Part VI, line 1a)		3		126
ලේ ග	4	Number of	f independent voting members of the governing body (Part VI, line 1b)		. 4		125
itie	5	Total num	ber of individuals employed in calendar year 2022 (Part V, line 2a)		5		1,271
÷	6	Total num	ber of volunteers (estimate if necessary)	<i>.</i>	6		1,070
ĕ	7a					-3,0	06,180.
	b	Net unrela	ated business taxable income from Form 990-T, Part I, line 11		7b		NONE
						Currer	nt Year
•	8	Contributi	ons and grants (Part VIII, line 1h)	72,10	6,220.	67.7	99,819.
ě	9					-	
ěve	10						
ř							
_	+			110,17			
	4-			43 56			
šė	16 a			13/00			
ē	h		The state of the s		- NOINE		03,320.
Ĕ	47			E 5 2 2	1 107		20 011
		•					
		•					
- ×		Revenue	ess expenses. Subtract line 18 from line 12				
arce	20	Total asso	to (Port V. line 46)				
Sal	21						
\$ E	21						
				4//,00	9,840.	4/2,9	43,843.
							
true	e, corre	ect, and com	plete. Declaration of preparer (other than officer) is based on all information of which preparer has	any knowledge.	best of my i	knowledge an	id bener, it is
		- 1/0	la he alleles		0.4./2.5./		
Sig	ın	Simparure	of officer			2024	
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	-	~		5O			
	Check if applicable Application ROBERT W. WOODRUFF ARTS CENTER, INC. Doing business as Number and street (or P.O. box if mail is not delivered to street address) Number and street (or P.O. box if mail is not delivered to street address) Final returniteriminated return Application pending Tax-exempt status: I Sol1(c)(3) Sol1(c)(4) Sol1(c)						
Paid	d	1.		1 .	~ <u> </u>		
		SABRE		/2024 self-	employed	P013729	80
	-	Firm's nam	ne SMITH & HOWARD ADVISORY, LLC	Firm's Etf			
		·		Phone no	. 4	04-874-	6244
_	_		<u> </u>		<u></u>		
For	Pape	rwork Red	uction Act Notice, see the separate instructions.			Form	990 (2022)

Form 990 (2022) Page 2

Pa		Statement of Program Service Accomplishments	\equiv
_			Χ
1	•	scribe the organization's mission:	
		ODRUFF ARTS CENTER'S MISSION IS TO INSPIRE, CREATE, SUPPORT,	
		LEBRATE RENOWNED ARTS AND EDUCATION FOR DIVERSE AUDIENCES	
		H A UNIQUE MODEL OF PARTNERSHIPS AND COLLABORATIONS, AND IN AN	
_		UTIONALLY SUSTAINABLE MANNER.	
2		ganization undertake any significant program services during the year which were not listed on the	No
		1 990 or 990-EZ? Yes X Secribe these new services on Schedule O.	NO
3		organization cease conducting, or make significant changes in how it conducts, any program	
3			No
		escribe these changes on Schedule O.	
4		the organization's program service accomplishments for each of its three largest program services, as measured	d by
	expenses.	Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to oth	iers,
	the total e	xpenses, and revenue, if any, for each program service reported.	
4a	(Code:) (Expenses \$ 40,972,100. including grants of \$) (Revenue \$19,067,266.)	
	ATLANT	A SYMPHONY ORCHESTRA: THE ATLANTA SYMPHONY ORCHESTRA UNITES,	
	EDUCAT	ES, AND ENRICHES OUR COMMUNITY THROUGH THE ENGAGING AND	
	TRANSF	ORMATIVE POWER OF ORCHESTRAL MUSIC EXPERIENCES. MORE THAN	
	_150 CO	NCERTS ARE PERFORMED EACH YEAR INCLUDING THE DELTA CLASSICAL	
	SERIES	, MOVIES IN CONCERT, FAMILY CONCERT SERIES, ATLANTA SYMPHONY	
		IVE AND THE COCA-COLA HOLIDAY SERIES, AS WELL AS COMMUNITY	
		UCATION CONCERTS. WITH EXCELLENT LIVE PERFORMANCES,	
		SIVE GUEST ARTISTS, A RENOWNED CHORUS, AND ENGAGING	
		ION INITIATIVES, THE GRAMMY® AWARD WINNING ATLANTA SYMPHONY	
	ORCHES	TRA CONTINUES TO BE A LEADER IN ITS INDUSTRY.	
	(Code:) (Expenses \$ 25,226,299. including grants of \$) (Revenue \$ 4,237,170.)	
70	SEE SCH		
	DEE DCII	EDOILE O	
4c	(Code:) (Expenses \$17,408,413 including grants of \$) (Revenue \$6,961,065)	
	SEE SCH	EDULE O	
۱۸ ۸	Other prod	gram services (Describe on Schedule O.)	
4U	(Expenses		
40	<u> </u>	ram service expenses 83 606 812	

JSA 2E1020 1.000

Form 990 (2022) Page **3**

Par	Checklist of Required Schedules		Yes	Na
	In the committee described in section $EO((a)/2)$ or $AO(7/a)/4$ (other than a private foundation)? If "Voc"		162	No
1	Is the organization described in section 501(c)(3) or 4947(a)(1) (other than a private foundation)? If "Yes," complete Schedule A	1	Х	
2	Is the organization required to complete Schedule B, Schedule of Contributors? See instructions	2	X	
3	Did the organization required to complete ochredule b, ochredule of contributors: See instructions Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to			
3	candidates for public office? If "Yes," complete Schedule C, Part I	3		Х
4	Section 501(c)(3) organizations. Did the organization engage in lobbying activities, or have a section 501(h)			
7	election in effect during the tax year? If "Yes," complete Schedule C, Part II	4	Х	
5	Is the organization a section $501(c)(4)$, $501(c)(5)$, or $501(c)(6)$ organization that receives membership dues,		- 21	
	assessments, or similar amounts as defined in Rev. Proc. 98-19? If "Yes," complete Schedule C, Part III	5		Х
6	Did the organization maintain any donor advised funds or any similar funds or accounts for which donors			
	have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If			
	"Yes," complete Schedule D, Part I	6		Х
7	Did the organization receive or hold a conservation easement, including easements to preserve open space,			
	the environment, historic land areas, or historic structures? If "Yes," complete Schedule D, Part II	7		Х
8	Did the organization maintain collections of works of art, historical treasures, or other similar assets? If "Yes,"			
	complete Schedule D, Part III	8	Х	
9	Did the organization report an amount in Part X, line 21, for escrow or custodial account liability, serve as a			
	custodian for amounts not listed in Part X; or provide credit counseling, debt management, credit repair, or			
	debt negotiation services? If "Yes," complete Schedule D, Part IV	9		Х
10	Did the organization, directly or through a related organization, hold assets in donor-restricted endowments			
	or in quasi endowments? If "Yes," complete Schedule D, Part V	10	Х	
11	If the organization's answer to any of the following questions is "Yes," then complete Schedule D, Parts VI,			
	VII, VIII, IX, or X, as applicable.			
а	Did the organization report an amount for land, buildings, and equipment in Part X, line 10? If "Yes,"			
	complete Schedule D, Part VI	11a	X	
b	Did the organization report an amount for investments-other securities in Part X, line 12, that is 5% or more			
	of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VII	11b	X	
С	Did the organization report an amount for investments-program related in Part X, line 13, that is 5% or more			
	of its total assets reported in Part X, line 16? If "Yes," complete Schedule D, Part VIII	11c		X
d	Did the organization report an amount for other assets in Part X, line 15, that is 5% or more of its total assets			
	reported in Part X, line 16? If "Yes," complete Schedule D, Part IX	11d		X
	Did the organization report an amount for other liabilities in Part X, line 25? If "Yes," complete Schedule D, Part X	11e		X
f	Did the organization's separate or consolidated financial statements for the tax year include a footnote that addresses			
	the organization's liability for uncertain tax positions under FIN 48 (ASC 740)? If "Yes," complete Schedule D, Part X	11f	X	
12 a	Did the organization obtain separate, independent audited financial statements for the tax year? If "Yes," complete			
	Schedule D, Parts XI and XII.	12a		X
b	Was the organization included in consolidated, independent audited financial statements for the tax year? If	40.		
40	"Yes," and if the organization answered "No" to line 12a, then completing Schedule D, Parts XI and XII is optional	12b	X	
13	Is the organization a school described in section 170(b)(1)(A)(ii)? If "Yes," complete Schedule E	13		X
	Did the organization maintain an office, employees, or agents outside of the United States?	14a		_X
b	Did the organization have aggregate revenues or expenses of more than \$10,000 from grantmaking,			
	fundraising, business, investment, and program service activities outside the United States, or aggregate foreign investments valued at \$100,000 or more? <i>If "Yes," complete Schedule F, Parts I and IV</i>	14b	Х	
15	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of grants or other assistance to or	140		
13	for any foreign organization? If "Yes," complete Schedule F, Parts II and IV	15		Х
16	Did the organization report on Part IX, column (A), line 3, more than \$5,000 of aggregate grants or other			
. •	assistance to or for foreign individuals? If "Yes," complete Schedule F, Parts III and IV	16		Х
17	Did the organization report a total of more than \$15,000 of expenses for professional fundraising services on			
	Part IX, column (A), lines 6 and 11e? If "Yes," complete Schedule G, Part I. See instructions	17		Х
18	Did the organization report more than \$15,000 total of fundraising event gross income and contributions on			
-	Part VIII, lines 1c and 8a? If "Yes," complete Schedule G, Part II	18	Х	
19	Did the organization report more than \$15,000 of gross income from gaming activities on Part VIII, line 9a?			
-	If "Yes," complete Schedule G, Part III	19		Х
20 a	Did the organization operate one or more hospital facilities? <i>If</i> "Yes," complete Schedule H	20a		X
	If "Yes" to line 20a, did the organization attach a copy of its audited financial statements to this return?	20b		
21	Did the organization report more than \$5,000 of grants or other assistance to any domestic organization or			
	domestic government on Part IX, column (A) line 12 If "Vas " complete Schedule I, Parts I and II	21		Y

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Part	Checklist of Required Schedules (continued)			
			Yes	No
22	Did the organization report more than \$5,000 of grants or other assistance to or for domestic individuals on			
	Part IX, column (A), line 2? If "Yes," complete Schedule I, Parts I and III	22		Х
23	Did the organization answer "Yes" to Part VII, Section A, line 3, 4, or 5, about compensation of the			
	organization's current and former officers, directors, trustees, key employees, and highest compensated			
	employees? If "Yes," complete Schedule J	23	X	
24 a	Did the organization have a tax-exempt bond issue with an outstanding principal amount of more than			
	\$100,000 as of the last day of the year, that was issued after December 31, 2002? If "Yes," answer lines 24b			
	through 24d and complete Schedule K. If "No," go to line 25a	24a	Х	
h	Did the organization invest any proceeds of tax-exempt bonds beyond a temporary period exception?	24b	- 21	Х
	Did the organization maintain an escrow account other than a refunding escrow at any time during the year	240		
C		240		7.7
	to defease any tax-exempt bonds?	24c		X
	Did the organization act as an "on behalf of" issuer for bonds outstanding at any time during the year?	24d		X
25 a	Section 501(c)(3), 501(c)(4), and 501(c)(29) organizations. Did the organization engage in an excess benefit			
_	, , , , , , , , , , , , , , , , , , , ,	25a		X
b	Is the organization aware that it engaged in an excess benefit transaction with a disqualified person in a prior			
	year, and that the transaction has not been reported on any of the organization's prior Forms 990 or 990-EZ?			
	If "Yes," complete Schedule L, Part I	25b		X
26	Did the organization report any amount on Part X, line 5 or 22, for receivables from or payables to any current			
	or former officer, director, trustee, key employee, creator or founder, substantial contributor, or 35%			
	controlled entity or family member of any of these persons? If "Yes," complete Schedule L, Part II	26		X
27	Did the organization provide a grant or other assistance to any current or former officer, director, trustee, key			
	employee, creator or founder, substantial contributor or employee thereof, a grant selection committee			
	member, or to a 35% controlled entity (including an employee thereof) or family member of any of these			
	persons? If "Yes," complete Schedule L, Part III	27		Х
28	Was the organization a party to a business transaction with one of the following parties (see the Schedule L,			
	Part IV, instructions for applicable filing thresholds, conditions, and exceptions):			
а	A current or former officer, director, trustee, key employee, creator or founder, or substantial contributor? If			
_	"Yes," complete Schedule L, Part IV	28a		Х
h	A family member of any individual described in line 28a? <i>If</i> "Yes," complete Schedule L, Part IV.	28b		X
	A 35% controlled entity of one or more individuals and/or organizations described in line 28a or 28b? If	200		21
·	"Yes," complete Schedule L, Part IV	28c		Х
20	Did the organization receive more than \$25,000 in non-cash contributions? <i>If "Yes," complete Schedule M</i>	29	X	Λ
29		29		
30	Did the organization receive contributions of art, historical treasures, or other similar assets, or qualified			
	conservation contributions? If "Yes," complete Schedule M	30	X	
31	Did the organization liquidate, terminate, or dissolve and cease operations? If "Yes," complete Schedule N, Part I	31		X
32	Did the organization sell, exchange, dispose of, or transfer more than 25% of its net assets? If "Yes,"			
	complete Schedule N, Part II.	32		X
33	Did the organization own 100% of an entity disregarded as separate from the organization under Regulations			
	sections 301.7701-2 and 301.7701-3? If "Yes," complete Schedule R, Part I.	33	X	
34	Was the organization related to any tax-exempt or taxable entity? If "Yes," complete Schedule R, Part II, III,			
	or IV, and Part V, line 1	34	X	
	Did the organization have a controlled entity within the meaning of section 512(b)(13)?	35a		Х
b	If "Yes" to line 35a, did the organization receive any payment from or engage in any transaction with a			
	controlled entity within the meaning of section 512(b)(13)? If "Yes," complete Schedule R, Part V, line 2	35b		
36	Section 501(c)(3) organizations. Did the organization make any transfers to an exempt non-charitable			
	related organization? If "Yes," complete Schedule R, Part V, line 2	36		Х
37	Did the organization conduct more than 5% of its activities through an entity that is not a related organization			
	and that is treated as a partnership for federal income tax purposes? If "Yes," complete Schedule R, Part VI	37		Х
38	Did the organization complete Schedule O and provide explanations on Schedule O for Part VI, lines 11b and			
	19? Note: All Form 990 filers are required to complete Schedule O	38	Х	
Part				
	Check if Schedule O contains a response or note to any line in this Part V			
	, , , , , , , , , , , , , , , , , , , ,		Yes	No
1a	Enter the number reported in box 3 of Form 1096. Enter -0- if not applicable			
	Enter the number of Forms W-2G included on line 1a. Enter -0- if not applicable			
	Did the organization comply with backup withholding rules for reportable payments to vendors and	1		
J	reportable gaming (gambling) winnings to prize winners?	1c	Х	
	. spec genning (gennemig) minings to prize ministre. I I I I I I I I I I I I I I I I I I I			

2.000 3370FZ 9242 04/10/2024 P. U.S. PECTION COPY Form 990 (2022) Page 5

Par	t V Statements Regarding Other IRS Filings and Tax Compliance (continued)		Yes	No
2a	Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax			
	Statements, filed for the calendar year ending with or within the year covered by this return. 271			
b	If at least one is reported on line 2a, did the organization file all required federal employment tax returns?	2b	X	
	Did the organization have unrelated business gross income of \$1,000 or more during the year?	3a	X	
	If "Yes," has it filed a Form 990-T for this year? If "No" to line 3b, provide an explanation on Schedule O	3b	X	
	At any time during the calendar year, did the organization have an interest in, or a signature or other authority over,			
	a financial account in a foreign country (such as a bank account, securities account, or other financial account)?	4a		Х
b	If "Yes," enter the name of the foreign country			
	See instructions for filing requirements for FinCEN Form 114, Report of Foreign Bank and Financial Accounts (FBAR).			
5a	Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	5a		Х
	Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	5b		Х
	If "Yes" to line 5a or 5b, did the organization file Form 8886-T?	5c		
	Does the organization have annual gross receipts that are normally greater than \$100,000, and did the			
- u	organization solicit any contributions that were not tax deductible as charitable contributions?	6a		Х
h	If "Yes," did the organization include with every solicitation an express statement that such contributions or			
~	gifts were not tax deductible?	6b		
7	Organizations that may receive deductible contributions under section 170(c).			
	Did the organization receive a payment in excess of \$75 made partly as a contribution and partly for goods			
а	and services provided to the payor?	7a	Х	
h	If "Yes," did the organization notify the donor of the value of the goods or services provided?	7b	X	
	Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it was		- 11	
C	required to file Form 8282?	7c		Х
	If "Yes," indicate the number of Forms 8282 filed during the year			21
		7e		Х
_	Did the organization receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	7f		X
f	Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	7g		Λ
9	If the organization received a contribution of qualified intellectual property, did the organization file Form 8899 as required?	79 7h		
_	If the organization received a contribution of cars, boats, airplanes, or other vehicles, did the organization file a Form 1098-C?	7 11		
8	Sponsoring organizations maintaining donor advised funds. Did a donor advised fund maintained by the	8		
^	sponsoring organization have excess business holdings at any time during the year?	-		
9	Sponsoring organizations maintaining donor advised funds.	9a		
	Did the sponsoring organization make any taxable distributions under section 4966?	9b		
	Did the sponsoring organization make a distribution to a donor, donor advisor, or related person?	90		
	Section 501(c)(7) organizations. Enter: Initiation fees and capital contributions included on Part VIII. line 12			
	Gross receipts, included on Form 990, Part VIII, line 12, for public use of club facilities 10b			
11	Section 501(c)(12) organizations. Enter:			
	Gross income from members or shareholders			
b	Gross income from other sources. (Do not net amounts due or paid to other sources			
40-	against amounts due or received from them.)	12a		
	Section 4947(a)(1) non-exempt charitable trusts. Is the organization filing Form 990 in lieu of Form 1041? If "Yes " enter the amount of tax-exempt interest received or accrued during the year. 12b	120		
	in too, onto the amount of tax exempt interest received of accorded daring the year.			
	Section 501(c)(29) qualified nonprofit health insurance issuers.	13a		
а	Is the organization licensed to issue qualified health plans in more than one state?	ısa		
1.	Note: See the instructions for additional information the organization must report on Schedule O.			
a	Enter the amount of reserves the organization is required to maintain by the states in which the organization is licensed to issue qualified health plans			
_	The state of the s			
		14a		Х
	Did the organization receive any payments for indoor tanning services during the tax year?	14a 14b		
	If "Yes," has it filed a Form 720 to report these payments? If "No," provide an explanation on Schedule O	140		
15	Is the organization subject to the section 4960 tax on payment(s) of more than \$1,000,000 in remuneration or	15		v
	excess parachute payment(s) during the year?	15		X
4.0	If "Yes," see the instructions and file Form 4720, Schedule N.	16		v
16	Is the organization an educational institution subject to the section 4968 excise tax on net investment income? If "Yes," complete Form 4720, Schedule O.	16		X
4				
17	Section 501(c)(21) organizations. Did the trust, or any disqualified or other person engage in any activities	17		
	that would result in the imposition of an excise tax under section 4951, 4952, or 4953? If "Yes." complete Form 6069.	17		

Page 6 Form 990 (2022) WOODRUFF ARTS CENTER, 58-0633971 Part VI Governance, Management, and Disclosure. For each "Yes" response to lines 2 through 7b below, and for a response to line 8a, 8b, or 10b below, describe the circumstances, processes, or changes on Schedule O. See instructions. Check if Schedule O contains a response or note to any line in this Part VI Section A. Governing Body and Management No 126 1a Enter the number of voting members of the governing body at the end of the tax year If there are material differences in voting rights among members of the governing body, or if the governing body delegated broad authority to an executive committee or similar committee, explain on Schedule O. 125 Enter the number of voting members included on line 1a, above, who are independent Did any officer, director, trustee, or key employee have a family relationship or a business relationship with 2 Χ 3 Did the organization delegate control over management duties customarily performed by or under the direct 3 Χ supervision of officers, directors, trustees, or key employees to a management company or other person?.... 4 Χ 4 Did the organization make any significant changes to its governing documents since the prior Form 990 was filed? 5 Χ 5 Did the organization become aware during the year of a significant diversion of the organization's assets?.... 6 Χ 6 7a Did the organization have members, stockholders, or other persons who had the power to elect or appoint 7a Χ Are any governance decisions of the organization reserved to (or subject to approval by) members, 7b Χ Did the organization contemporaneously document the meetings held or written actions undertaken during the year by the following: 8a Х Χ Each committee with authority to act on behalf of the governing body?............... Is there any officer, director, trustee, or key employee listed in Part VII, Section A, who cannot be reached at the organization's mailing address? If "Yes," provide the names and addresses on Schedule O. 9 Χ Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.) Yes No Χ 10a b If "Yes," did the organization have written policies and procedures governing the activities of such chapters, 10b affiliates, and branches to ensure their operations are consistent with the organization's exempt purposes? . . . 11a Χ Has the organization provided a complete copy of this Form 990 to all members of its governing body before filing the form? . **b** Describe on Schedule O the process, if any, used by the organization to review this Form 990. 12a Х Were officers, directors, or trustees, and key employees required to disclose annually interests that could give 12b Χ c Did the organization regularly and consistently monitor and enforce compliance with the policy? If "Yes," 12c X 13 Χ 13 14 Χ 14 Did the organization have a written document retention and destruction policy?............ Did the process for determining compensation of the following persons include a review and approval by independent persons, comparability data, and contemporaneous substantiation of the deliberation and decision? 15a Χ 15b Χ If "Yes" to line 15a or 15b, describe the process on Schedule O. See instructions. 16a Did the organization invest in, contribute assets to, or participate in a joint venture or similar arrangement 16a Χ b If "Yes," did the organization follow a written policy or procedure requiring the organization to evaluate its participation in joint venture arrangements under applicable federal tax law, and take steps to safeguard the organization's exempt status with respect to such arrangements? Section C. Disclosure SEE SCHEDULE O List the states with which a copy of this Form 990 is required to be filed 17

Section 6104 requires an organization to make its Forms 1023 (1024 or 1024-A, if applicable), 990, and 990-T (section 501(c) (3)s only) available for public inspection. Indicate how you made these available. Check all that apply.

Own website Another's website X Upon request Other (explain on Schedule O)

19 Describe on Schedule O whether (and if so, how) the organization made its governing documents, conflict of interest policy, and financial statements available to the public during the tax year.

20 State the name, address, and telephone number of the person who possesses the organization's books and records HALA MODDELMOG 1280 PEACHTREE ST. ATLANTA, GA 30309

Form **990** (2022)

INC. Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, **Independent Contractors**

Check if Schedule O contains a response or note to any line in this Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

- 1a Complete this table for all persons required to be listed. Report compensation for the calendar year ending with or within the organization's tax year.
- List all of the organization's current officers, directors, trustees (whether individuals or organizations), regardless of amount of compensation. Enter -0- in columns (D), (E), and (F) if no compensation was paid.
 - List all of the organization's current key employees, if any. See the instructions for definition of "key employee."
- List the organization's five current highest compensated employees (other than an officer, director, trustee, or key employee) who received reportable compensation (box 5 of Form W-2, box 6 of Form 1099-MISC, and/or box 1 of Form 1099-NEC) of more than \$100,000 from the organization and any related organizations.
- List all of the organization's former officers, key employees, and highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.
- List all of the organization's former directors or trustees that received, in the capacity as a former director or trustee of the organization, more than \$10,000 of reportable compensation from the organization and any related organizations.

See the instructions for the order in which to list the persons above.

Check this box if neither the organization nor any related organization compensated any current officer, director, or trustee.

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	box, office or direct	unles	Pos neck ss pe	rson	e than of the both or/trust Highest compensated employee	an	(D) Reportable compensation from the organization (W-2/ 1099-MISC/ 1099-NEC)	(E) Reportable compensation from related organizations (W-2/ 1099-MISC/ 1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
(1) RAND SUFFOLK	40.00									
HIGH MUSEUM DIRECTOR	NONE				X			624,034.	NONE	66,235.
(2) HALA MODDELMOG	40.00				21			021,031.	110111	00,233.
PRESIDENT	NONE	Х		Х				511,889.	NONE	4,636.
(3) SUSAN BOOTH	40.00							522,557		
ARISTIC DIRECTOR - AT	NONE				X			459,073.	NONE	32,690.
(4) JENNIFER BARLAMENT	40.00									
EXECUTIVE DIRECTOR - ASO	NONE				Х			403,682.	NONE	59,078.
(5) MICHAEL SCHLEIFER	40.00									
INTERIM EXECUTVIE DIRECTOR	NONE				X			324,637.	NONE	40,382.
(6) BRADY LUM	40.00									
DEPUTY DIRECTOR	NONE				Х			298,044.	NONE	41,352.
(7) SUSAN AMBO	40.00									
CFO ASO	NONE				X			316,963.	NONE	11,356.
(8) KRISTIN HANSEN	40.00									
CHIEF DEVELOPMENT OFFICER	NONE				X			272,531.	NONE	10,920.
(9) DAVID COUCHERON	40.00									
CONCERTMASTER	NONE					X		257,828.	NONE	11,590.
(10) ELEANOR TARVIN	40.00									
CHIEF HUMAN RESOURCES OFFICER	NONE				X			249,558.	NONE	18,748.
(11) BETH GIBBS	40.00									
GENERAL COUNSEL	NONE			Χ				235,886.	NONE	6,028.
(12) BRIAN WALLEY	40.00	-		3.7				214 000	37037	22 550
CFO (EFFECTIVE 06/01/2022) (13) ROBERT SPANO	40.00			X				214,080.	NONE	23,552.
MUSIC DIRECTOR	NONE	-			X			210,694.	NONE	19,921.
(14) KAMA PIERCE	40.00		\vdash		_^			210,094.	NONE	15,521.
SR VP OF STRATEGY	NONE	1				x		198,048.	NONE	7,897.

Form **990** (2022)

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Part VII Section A. Officers, Directors, Tru		y Em	plo			and I	lıg	•	ea Employees (a	<i></i>
(A)	(B)			-	C)			(D)	(E)	(F)
Name and title	Average	(do r	not ch		ition	e than c	ne	Reportable	Reportable	Estimated amount of
	hours per week (list any					is both		compensation from	compensation from related	other
	hours for					or/trust		the	organizations	compensation
	related	Indi	Inst	Officer	Key employee	High	Forme	organization	(W-2/1099-MISC)	from the
	organizations below dotted	/idu	itutio	er	emp	loye	ner	(W-2/1099-MISC)		organization and related
	line)	or tr	onal		oloye	com				organizations
		Individual trustee or director	Institutional trustee		ě	pen				
		0	tee			Highest compensated employee				
1E\ CDACE CIDUCIO	40.00					۵				
15) GRACE SIPUSIC VP OF DEVELOPMENT ASO	40.00 NONE					X		107 /55	NONE	16 260
16) KEVIN TUCKER	40.00					Λ		187,455.	NONE	16,260.
CHIEF CURATOR	NONE					X		107 /56	NONE	15 040
						Λ		187,456.	NONE	15,040.
17) BRIAN SHIVELY	40.00 NONE				7.7			107 506	MONTE	4 257
DIRECTOR OF FINANCE & ADMIN	NONE				X			187,586.	NONE	4,357.
18) NICOLE PANUNTI	40.00 NONE					,,,		107 556	NONTE	2 767
VP OF ATLANTA SYMPHONY HALL	NONE					X		187,556.	NONE	3,767.
19) PAT GUNNING	40.00 NONE			3.5				110 412	NONTE	310311
CFO (TERM 05/31/2022)	NONE			Х				110,413.	NONE	NONE
20) BENNY VARZI	3.00 NONE							NONE	NONTE	310311
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
21) CLAIRE LEWIS ARNOLD	3.00							17017	370375	370377
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
22) D. RICHARD WILLIAMS	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
23) DANIEL BALDWIN	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
24) DAVID B. SEWELL	3.00							17017	370375	
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
25) DERETTA RHODES	3.00							17017	370375	
GOVERNING BOARD	NONE	X					<u> </u>	NONE		NONE
1b Sub-total							>	5,437,413.	NONE	393,809.
c Total from continuation sheets to Part VII, S	-							NONE		NONE
d Total (add lines 1b and 1c)							_	5,437,413.	NONE	393,809.
2 Total number of individuals (including but not reportable compensation from the organizatio		nose	liste	d a			o re	eceived more than	\$100,000 of	
Teportable compensation from the organization						91				Yes No
										Yes No
3 Did the organization list any former offic employee on line 1a? If "Yes," complete Sched										3
										3
4 For any individual listed on line 1a, is the	sum of rep	ortab	le c	com	per	satio	n a	nd other compens	sation from the	
organization and related organizations gr										
individual										4
5 Did any person listed on line 1a receive or										_
for services rendered to the organization? If "Y	es," compie	te Scr	neau	iie J	TO	sucn	per	rson		5
Section B. Independent Contractors	nonoctod !	ndes -	. n.d -	n+	00.5	tract-	rc 1	that received man	than \$100 000 -	.f
1 Complete this table for your five highest com- compensation from the organization. Report of										
year.	.cmponoati	O11 101			.0110	.a. ye	J. C	Ziianig with or with	the organizatio	ux
							_			

(A) Name and business address	(B) Description of services	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

R ang Form 990 (2022)

Part VII Section A. Officers, Directors, Tru	ustees, Ke	y En	nplo	yee	es,	and F	lig	hest Compensat	ed Employees (d	continued)
(A) Name and title	(B) Average hours per	(do i	not cl	Pos	C) sition more	e than o	ne	(D) Reportable compensation	(E) Reportable compensation from	(F) Estimated amount of
	week (list any hours for related organizations below dotted line)					is both or/trusted Highest compensated		from the organization (W-2/1099-MISC)	related organizations (W-2/1099-MISC)	other compensation from the organization and related organizations
26) GALEN L. OELKERS	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
(27) GLENN W. MITCHELL III	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
(28) JOCELYN HUNTER	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
(29) JOHN C. YATES	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
(30) KATHY N. WALLER	3.00	.,						NONE	NONE	NONE
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
(31) KENNETH NEIGHBORS GOVERNING BOARD	3.00 NONE	X						NONE	NONE	NONE
32) MICHAEL J. EGAN III	3.00							NONE	NONE	NONE
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
33) PATRICK VIGUERIE	3.00	- 21						110111	110111	IVOIVI
GOVERNING BOARD	NONE	Х						NONE	NONE	NONE
34) RAVI SALIGRAM	3.00								-	-
GOVERNING BOARD	NONE	Х						NONE	NONE	NONE
35) ROBIN HOWELL	3.00									
GOVERNING BOARD	NONE	Х						NONE	NONE	NONE
36) THOMAS C. CHUBB	3.00									
GOVERNING BOARD	NONE	X						NONE	NONE	NONE
1b Sub-total c Total from continuation sheets to Part VII, S d Total (add lines 1b and 1c)	_			 			* * *			
2 Total number of individuals (including but not reportable compensation from the organizatio		hose	liste	d al	bov	e) who	re	eceived more than	\$100,000 of	
Teportable compensation from the organization										Yes No
3 Did the organization list any former office employee on line 1a? If "Yes," complete Sched										3
4 For any individual listed on line 1a, is the organization and related organizations gr individual	eater than	\$15	50,0	00?	. It	"Yes	,"	complete Schedu	le J for such	4
5 Did any person listed on line 1a receive or for services rendered to the organization? If "Y										5
Section B. Independent Contractors		1		•		t •		Unit was a second	th 6400 000	
Complete this table for your five highest componentation from the organization. Report of the component										

(A) Name and business address	(B) Description of services	(C) Compensation

² Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

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Part VII Section A. Officers, Directors, T	rustees, Ke	y En	nplo	ye	es,	and I	Hig	hest Compensat	ed Employees	(continued)
(A) Name and title	(B) Average hours per week (list any hours for	box,	unle	Pos heck ss pe	erson	e than o	an tee)	(D) Reportable compensation from the	(E) Reportable compensation fro related organizations	(F) Estimated om amount of other compensation
	related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MISC	from the organization and related organizations
37) ALDO LAFIANDRA	1.00									
VOTING TRUSTEE (38) ALI (AL) AZADI	1.00	X						NONE	NOI	NE NONI
VOTING TRUSTEE	NONE	X						NONE	NOI	NE NONI
(39) ANDJELA KESSLER	1.00							110112	1101	1.011.
VOTING TRUSTEE	NONE	Х						NONE	NOI	NE NONI
40) ANDY BERG	1.00									
VOTING TRUSTEE	NONE	Х						NONE	NOI	NE NONI
41) ANGELA SPIVEY	1.00									
VOTING TRUSTEE	NONE	X	-					NONE	NOI	NE NON
(42) ANITA WARD	1.00	37						NONE	NIO	NON!
VOTING TRUSTEE 43) ASHISH MISTRY	1.00	X						NONE	NOI	NE NONI
VOTING TRUSTEE	NONE	X						NONE	NOI	NE NONI
44) BERT MILLS	1.00									
VOTING TRUSTEE	NONE	Х						NONE	NOI	NE NONI
45) BHARATH PARTHASARATHY	1.00									
VOTING TRUSTEE	NONE	X						NONE	NOI	NE NONI
(46) BJ GREEN	1.00									
VOTING TRUSTEE	NONE	X						NONE	NOI	NE NONI
(47) BOB JIMENEZ VOTING TRUSTEE	<u>1.00</u> _ NONE	X						NONE	NOI	NE NONI
1b Sub-total	INOINE	ΙΛ.						NONE	INOI	NE NON
c Total from continuation sheets to Part VII,	Section A	• • •	• •	• •	• •					
d Total (add lines 1b and 1c)	-		• •	• •			>			
Total number of individuals (including but no reportable compensation from the organization)	t limited to t						o re	eceived more than	\$100,000 of	1
3 Did the organization list any former off employee on line 1a? If "Yes," complete Sche										Yes No
4 For any individual listed on line 1a, is the organization and related organizations gindividual.	reater than	\$15	50,0	00?	? It	"Yes	s,"	complete Schedu	le J for such	4
5 Did any person listed on line 1a receive o for services rendered to the organization? If "	r accrue co	mpen	sati	on	fron	n any	un	related organization	on or individual	
Section B. Independent Contractors										
1 Complete this table for your five highest concompensation from the organization. Report year.										
(A) Name and business a	ddress							(B) Description of se	rvices	(C) Compensation
							-			
2 Total number of independent contractors (includina bi	ut no	t lin	nite	d to	thos	se li	isted above) who	received	

more than \$100,000 in compensation from the organization ▶

Page 8

Part VII Section A. Officers, Directors, Tr	ustees, Ke	y En	nplo	ye	es,	and I	lig	hest Compensat	ed Employees	(continued)
(A) Name and title	(B) Average hours per week (list any	box,	unles	Pos neck ss pe	rson	than o	an	(D) Reportable compensation from the	(E) Reportable compensation fro related organizations	(F) Estimated amount of other compensation
	related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MIS	
48) BRENDAN DOHERTY	1.00									
VOTING TRUSTEE	NONE	X						NONE	NO	NE NONE
49) BRIAN MAHONY	1.00									
VOTING TRUSTEE	NONE	X						NONE	NO	NE NON
50) CANDACE STEELE FLIPPIN, PHD VOTING TRUSTEE	1.00 NONE	X						NONE	NO	NE NONI
51) CARLI HUBAND	1.00									
VOTING TRUSTEE	NONE	X						NONE	NO	NE NON
52) CAROL YANCEY VOTING TRUSTEE	1.00 NONE	X						NONE	NO	NE NON
53) CARRIE BROWN	1.00	 								
VOTING TRUSTEE	NONE	X						NONE	NO	NE NON
54) CHAITRA BRYANT VOTING TRUSTEE	1.00 NONE	X						NONE	NO	NE NON
55) CHANEL H. FRAZIER	1.00									
VOTING TRUSTEE	NONE	X						NONE	NO	NE NONI
56) CHARLES F. PALMER VOTING TRUSTEE	1.00	3,7						NONE	NO	NII NIONI
57) CHRISTINE WHITAKER	1.00	X						NONE	NO	NE NON
VOTING TRUSTEE	NONE	X						NONE	NO	NE NON
58) CHRISTOPHER CUMMISKEY	1.00							INOINE	110	IND INOIN
VOTING TRUSTEE	NONE	X						NONE	NO	NE NON
4h Cuh tatal	NOINE	Λ.					_	NOINE	INO	INE INOIN
c Total from continuation sheets to Part VII, S d Total (add lines 1b and 1c) Total number of individuals (including but not reportable compensation from the organizatio	limited to t		liste	d al	bove	e) who	o re	eceived more than	\$100,000 of	
3 Did the organization list any former office employee on line 1a? If "Yes," complete Scheduler 1 and	cer, directo									
4 For any individual listed on line 1a, is the organization and related organizations gr individual	eater than	\$15	50,0	00?	If	"Yes	5,"	complete Schedu		
5 Did any person listed on line 1a receive or for services rendered to the organization? If "Y										
Section B. Independent Contractors										
 Complete this table for your five highest com- compensation from the organization. Report of year. 										
(A) Name and business ad	dress							(B) Description of se	rvices	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

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Part VII Section A. Officers, Directors, Tr	ustees, Ke	y En	plo	yee	es,	and F	ligl	hest Compensat	ed Employees (d	continued)
(A)	(B)			(0				(D)	(E)	(F)
Name and title	Average hours per	(do r	not ch	Posi		than o	ne	Reportable compensation	Reportable compensation from	Estimated amount of
	week (list any	box,	unles	s pe	rson	is both	an	from	related	other
	hours for related					or/trust		the	organizations	compensation from the
	organizations	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest co employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MISC)	organization
	below dotted	dual	ıtion	٦	mplc	st co	¥	(** 27 1000 miles)		and related
	line)	trus	al tr		уее	ompe				organizations
		ee	ıstee			compensated ee				
						ted				
(59) COLIN CONNOLLY	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
(60) DAVID DASE	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
(61) DAVID LEITER	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
(62) DAVID PARK VOTING TRUSTEE	1.00 NONE							NONE	NONTE	NONE
(63) DAVID W. SCHEIBLE	1.00	Х						NONE	NONE	NONE
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
(64) DENNIS LOCKHART	1.00	21						NONE	NONE	NONE
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
(65) DOUGLAS J. HERTZ	1.00							110112	110112	110112
VOTING TRUSTEE	NONE	Х						NONE	NONE	NONE
(66) EDWARD H. BASTIAN	1.00							-	-	
VOTING TRUSTEE	NONE	Х						NONE	NONE	NONE
(67) ERICA QUALLS-BATTEY	1.00									
VOTING TRUSTEE	NONE	Х						NONE	NONE	NONE
(68) G. SCOTT UZZELL	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
(69) GLEN JACKSON	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
1b Sub-total							>			
c Total from continuation sheets to Part VII, S	-									
d Total (add lines 1b and 1c)			lina.	 			<u> </u>		#400 000 -f	
2 Total number of individuals (including but not reportable compensation from the organizatio		nose	iiste	a a	OOVE	e) wnc	o re	ceived more than	\$100,000 01	
Teportable compensation from the organization										Yes No
3 Did the organization list any former office	or directo	r or	tru	ıcto	_	kov o	mn	lovoo or highos	t componented	163 140
employee on line 1a? If "Yes," complete Sched										3
4 For any individual listed on line 1a, is the organization and related organizations gr										
individual										4
5 Did any person listed on line 1a receive or										
for services rendered to the organization? If "Y										5
Section B. Independent Contractors										
1 Complete this table for your five highest compensation from the organization. Percet										

year.

(A) Name and business address	(B) Description of services	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

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Part VII Section A. Officers, Directors, Tr		y En	ıplo			and F	ııg	1		continu 		
(A) Name and title	(B) Average				C) sition			(D) Reportable	(E) Reportable		(F) stimated	
ivalile and title	hours per	,		neck	more	e than o		compensation	compensation from		mount o	
	week (list any hours for	office				is both or/trust		from	related	con	other npensati	ion
	related	or a						the organization	organizations (W-2/1099-MISC)		rom the	OH
	organizations below dotted	ividu	tituti	Officer	/ emi	hest ploye	Former	(W-2/1099-MISC)	,	1	ganization nd relate	
	line)	al tru	onal		Key employee	com					janizatio	
		Individual trustee or director	Institutional trustee		ď	Highest compensated employee						
			8			ated						
70) GREGORY H. WORTHY	1.00											
VOTING TRUSTEE	NONE	X						NONE	NON	<u> </u>		NONE
71) HARVEY GREEN	1.00	٠						17017	1 17017			
VOTING TRUSTEE	NONE	X						NONE	NON!	1		NONE
72) HOWARD D. PALEFSKY VOTING TRUSTEE	1.00 NONE	X						NONE	NON!			NONE
73) J. VERONICA BIGGINS	1.00	_ ^						NONE	INOINI	1		NONE
VOTING TRUSTEE	NONE	X						NONE	NON!	7		NONE
74) JAMES B. HANNAN	1.00	21						110111	110111			110111
VOTING TRUSTEE	NONE	X						NONE	NON!	<u>.</u>		NONE
75) JAMES H. SIMPSON III	1.00											
VOTING TRUSTEE	NONE	Х						NONE	NON!	3		NONE
76) JAMES W. BOSWELL	1.00											
VOTING TRUSTEE	NONE	X						NONE	NON!	3		NONE
77) JAMILA M. HALL	1.00											
VOTING TRUSTEE	NONE	X						NONE	NON!	3		NONE
78) JANE D. LANIER	1.00											
VOTING TRUSTEE	NONE	X						NONE	NON!	•		NONE
79) JANET SIMPSON	$\frac{1.00}{NONE}$	X						NONE	NIONII			NIONIE
VOTING TRUSTEE 80) JANINE BROWN	3.00	A						NONE	NON!	1		NONE
VOTING TRUSTEE	NONE	X						NONE	NON!	7		NONE
1b Sub-total	INOTAL						—	110112	11011			110111
c Total from continuation sheets to Part VII,	Section A				• •		•					
d Total (add lines 1b and 1c)	· -				• •		>					
2 Total number of individuals (including but not		hose	liste	d al	bove	e) who	re	eceived more than	\$100,000 of			
reportable compensation from the organization	on 🕨										Yes	No
3 Did the organization list any former offi	cer directo	or or	tru	icto		kov c	mn	Novee or highes	t compensated		103	140
employee on line 1a? If "Yes," complete Sched										3		
4 For any individual listed on line 1a, is the												
organization and related organizations g												
individual										4		
5 Did any person listed on line 1a receive of	accrue co	mpen	satio	on 1	fron	n any	un	related organization				
for services rendered to the organization? If "	es," comple	te Scl	nedu	ile J	I for	such	per	rson		5		
Section B. Independent Contractors 1 Complete this table for your five highest cor	nnensated i	ndene	ende	ent o	con	tracto	rs t	that received more	than \$100 000	of		
compensation from the organization. Report year.												
(A)								(B)		(C)	
Name and business ac	Idress						-	Description of se	ervices	Comper	sation	
							+					

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	Part VII Section A. Officers, Directors, Tru	ustees, Ke	y En	plc	ye	es,	and I	lig	hest Compensat	ed Employee	∋s (c	ontinue	d)	
_	(A) Name and title	(B) Average hours per week (list any hours for	box,	unles	Pos heck ss pe	erson	e than o is both tor/trust	an ee)	(D) Reportable compensation from the	(E) Reportable compensation related organization	on from amount of tions compe			
		related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MI	SC)	orga and	m the nizatior related nization	I
(_	81) JENNA KELLY	1.00												
_	VOTING TRUSTEE	NONE	X						NONE	N	ONE		1	NONE
(_	82) JIMMY ETHEREDGE	1.00												
_	VOTING TRUSTEE	NONE	X						NONE	N	ONE		1	NONE
(_	83) JOAN ABERNATHY	1.00												
_	VOTING TRUSTEE	NONE	X						NONE	N	ONE		1	NONE
(_	84) JOE W. ROGERS, JR.	1.00												
_	VOTING TRUSTEE	NONE	X						NONE	N	ONE		1	NONE
(_	85) JOHN MURPHY	1.00												
_	VOTING TRUSTEE	NONE	Х						NONE	N	ONE		1	NONE
(_	86) JOHN S. MARKWALTER, JR.	1.00												
_	VOTING TRUSTEE	NONE	X						NONE	N	ONE		1	NONE
(_	87) JOHNSON COOK	1.00												
_	VOTING TRUSTEE	NONE	X						NONE	N	ONE		1	NONE
(_	88) JON BRIDGES	1.00												
-	VOTING TRUSTEE	NONE	Х						NONE	N	ONE		1	NONE
(89) JORDY GAMSON	1.00												
-	VOTING TRUSTEE	NONE	Х						NONE	N	ONE		1	NONE
(90) JOSEPH O. BLANCO	1.00												
-	VOTING TRUSTEE	NONE	Х						NONE	N	ONE		1	NONE
(91) JOSHUA M. KAMIN	1.00												
-	VOTING TRUSTEE	NONE	Х						NONE	N	ONE		1	NONE
_	1b Sub-total c Total from continuation sheets to Part VII, S d Total (add lines 1b and 1c) Total number of individuals (including but not reportable compensation from the organization)	limited to t		liste	d al	bov	e) who	b b o re	eceived more than	\$100,000 of				
	3 Did the organization list any former office employee on line 1a? If "Yes," complete Sched	ule J for su	ch ina	livid	ual			• •				3	Yes	No
	4 For any individual listed on line 1a, is the organization and related organizations graindividual.	eater than	\$15	0,0	00?) It	"Yes	5,"	complete Schedu	le J for suc	ch	4		
_	5 Did any person listed on line 1a receive or for services rendered to the organization? If "Y											5		
_	Complete this table for your five highest components from the organization. Report of year.													
-	(A) Name and business add	dress							(B) Description of se	ervices	C	(C) Compensa	ation	
- -														

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Part VII Section A. Officers, Directors, Tru	ıstees, Ke	y En	nplo	ye	es,	and I	lig	hest Compensat	ed Employ	ees (c	ontinued)	
(A) Name and title	(B) Average hours per week (list any	,		Pos heck		e than o		(D) Reportable compensation from	(E) Reportal compensatio	n from	(F) Estimamou	ated nt of
	hours for related organizations below dotted line)	1				Highest compensated employee		the organization (W-2/1099-MISC)	organizati (W-2/1099-	ons	comper from organiz and re organiz	nsation the zation elated
92) JULIE ANN CROMMETT	1.00											
VOTING TRUSTEE	NONE	Х						NONE		NONE		NONE
93) KAPPY DEBUTTS	1.00											
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
94) KATE KIEFER LEE	1.00							1,01,1		110111		110111
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
95) KATHERINE SAEZ	1.00	21						NONE		IVOIVE		IVOIVE
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
96) KATHRYN PETRALIA		_ A						NONE		NONE		NONE
	1.00 NONE	3,7						NIONIE		NIONIE		NIONIE
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
97) KEVIN GOOCH	1.00 NONE	٠,,						310315		210211		NIONIE
VOTING TRUSTEE	NONE	Х						NONE		NONE		NONE
98) KIT HUGHES	1.00											
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
99) KJELL GRUNER	1.00											
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
100) KRISTEN SARIO	1.00	1										
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
101) KURT P. KUEHN	1.00											
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
102) LACEY JORDAN	1.00											
VOTING TRUSTEE	NONE	X						NONE		NONE		NONE
c Total from continuation sheets to Part VII, S d Total (add lines 1b and 1c) Total number of individuals (including but not reportable compensation from the organization)	limited to t		liste	d a	bove	e) who	> re	eceived more than	\$100,000 c	ıf	Y	es No
3 Did the organization list any former office employee on line 1a? If "Yes," complete Schedu											3	
4 For any individual listed on line 1a, is the organization and related organizations graindividual	eater than	\$15	50,0	00?) If	"Yes	5,"	complete Schedu	le J for s	such	4	
5 Did any person listed on line 1a receive or for services rendered to the organization? If "You Section B. Independent Contractors											5	
Complete this table for your five highest components of the organization. Report of year.												
(A) Name and business add	lress							(B) Description of se	ervices	С	(C) compensati	ion

Name and business address	Description of services	Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

Form 000 (2022)

NIER, INC. 50 0055571

Part VI Section A. Officers, Directors, Tr	ustees, Ke	y En	nplo	yee	es, a	and I	ligl	hest Compensat	ed Employees (c	ontinued)
(A)	(B)			(0				(D)	(E)	(F)
Name and title	Average hours per week (list any hours for	box,	unles er and	s per	more rson irect	than o is both or/trust	an ee)	Reportable compensation from the	Reportable compensation from related organizations	Estimated amount of other compensation
	related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MISC)	from the organization and related organizations
103) LARRY MARK	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
104) LAURA LANE	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONE
105) LEE ECHOLS	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONI
106) LEIGHANN COSTLEY	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
107) LINNEA GEISS	1.00	_								
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
108) LISA CALHOUN	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONI
109) LIZANNE THOMAS	1.00	-								
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
110) LOUISE SAMS	1.00	_								
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
111) LOVETTE RUSSELL	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONI
112) LYLE TICK	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
113) MARY L. CAHILL	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
1b Sub-total							\blacktriangleright			
c Total from continuation sheets to Part VII, S	Section A									
d Total (add lines 1b and 1c)							<u> </u>			
2 Total number of individuals (including but not		hose	liste	d at	oove	e) who	o re	eceived more than	\$100,000 of	
reportable compensation from the organization	on ▶									
										Yes No
3 Did the organization list any former office										
employee on line 1a? If "Yes," complete Scheo	dule J for su	ch ina	lividu	ıal .						3
4 For any individual listed on line 1a, is the organization and related organizations grandividual	reater than	\$15	50,0	00?	If	"Yes	5,"	complete Schedu	le J for such	4
5 Did any person listed on line 1a receive or										
for services rendered to the organization? <i>If "</i>)										5
Section B. Independent Contractors										
Complete this table for your five highest concompensation from the organization. Report year.										

(A) Name and business address	(B) Description of services	(C) Compensation

² Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

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Part VII Section A. Officers, Directors, Tru	ustees, Ke	y En	nplo	yee	es,	and I	ligl	hest Compensat	ed Employees (c	ontinued)	
(A)	(B)			((C)			(D)	(E)	(F))
Name and title	Average hours per	(do i	not ch	Pos	ition	e than c	ne	Reportable compensation	Reportable compensation from	Estima	ated
	week (list any					is both		from	related	othe	
	hours for related					or/trust □ ⊈ <u></u>		the	organizations	compen from	
	organizations	divio	stitu	Officer	Key employee	nplo	Former	organization (W-2/1099-MISC)	(W-2/1099-MISC)	organiz	
	below dotted	dual	ıtion	-	mplc	st co	4	(11 2/1000 111100)		and re	
	line)	Individual trustee or director	al tn		yee	ompe				organiz	ations
		tee	Institutional trustee			Highest compensated employee					
			O .			ted					
(114) MELISSA BABB	1.00										
VOTING TRUSTEE	NONE	X						NONE	NONE		NONE
(115) MERIA JOEL CARSTARPHEN, ED.D	1.00										
VOTING TRUSTEE	NONE	X						NONE	NONE		NONE
(116) MICHAEL DOSS	1.00										
VOTING TRUSTEE	NONE	X						NONE	NONE		NONE
(117) MICHAEL E. HOLLINGSWORTH II	1.00										
VOTING TRUSTEE	NONE	X						NONE	NONE		NONE
(118) MICHAEL J. SIVEWRIGHT	1.00										
VOTING TRUSTEE	NONE	X						NONE	NONE		NONE
(119) MICHAEL M. ROGERS	1.00										
VOTING TRUSTEE	NONE	Х						NONE	NONE		NONE
(120) MICHAEL S. DONNELLY	1.00										
VOTING TRUSTEE	NONE	Х						NONE	NONE		NONE
(121) MIKE HAYFORD	1.00										
VOTING TRUSTEE	NONE	Х						NONE	NONE		NONE
(122) MILFORD W. MCGUIRT	1.00										
VOTING TRUSTEE	NONE	Х						NONE	NONE		NONE
(123) MILTON LITTLE	1.00										
VOTING TRUSTEE	NONE	Х						NONE	NONE		NONE
(124) PAMELA STAHL	1.00										
VOTING TRUSTEE	NONE	Х						NONE	NONE		NONE
1b Sub-total											
c Total from continuation sheets to Part VII, S	ection A						>				
d Total (add lines 1b and 1c)	-						\blacktriangleright				
2 Total number of individuals (including but not				d al	bov	e) who	o re	ceived more than	\$100,000 of		
reportable compensation from the organizatio	n ▶					•					
										Ye	es No
3 Did the organization list any former office	er. directo	r. or	tru	ıste	e.	kev e	ame	lovee, or highes	t compensated		
employee on line 1a? If "Yes," complete Sched										3	
4 For any individual listed on line 1a, is the											
organization and related organizations gr											
individual										4	
5 Did any person listed on line 1a receive or											
for services rendered to the organization? If "Y	es," comple	te Scl	nedu	ıle J	l for	such	per	son		5	

Section B. Independent Contractors

1 Complete this table for your five highest compensated independent contractors that received more than \$100,000 of compensation from the organization. Report compensation for the calendar year ending with or within the organization's tax year.

(A) Name and business address	(B) Description of services	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

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Part VII Section A. Officers, Directors, Tru	ustees, Ke	y En	plc	ye	es,	and I	lig	hest Compensat	ed Employees (d	ontinue	d)	
(A) Name and title	(B) Average hours per week (list any hours for	box,	unles	Pos heck ss pe	erson	e than o is both tor/trust	an ee)	(D) Reportable compensation from the	(E) Reportable compensation from related organizations	Est am	(F) timated ount of other pensation	f
	related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MISC)	orga and	om the anizatio related nization	on d
(125) PAT GUNNING	1.00											
VOTING TRUSTEE (EFF. 06/01/22)	NONE	X						NONE	NONE			NONE
(126) PAT MITCHELL	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(127) PAUL E. VIERA	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(128) PENNY MCPHEE	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(129) PETER AMAN	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(130) PHILIP HARRISON	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(131) PHILIP S. JACOBS	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(132) PRADEEP K. SINHA, MD, PHD, FA	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(133) RAPHAEL W. BOSTIC	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(134) REGGIE WALKER	1.00	-										
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
(135) ROBERT BUNCH	1.00											
VOTING TRUSTEE	NONE	X						NONE	NONE			NONE
1b Sub-total												
c Total from continuation sheets to Part VII, S	_											
d Total (add lines 1b and 1c)					• •		<u> </u>					
2 Total number of individuals (including but not		hose	liste	d a	bov	e) who	o re	eceived more than	\$100,000 of			
reportable compensation from the organization	n ▶											
											Yes	No
3 Did the organization list any former office										_		
employee on line 1a? If "Yes," complete Sched	ule J for su	ch ina	ivid	ual						3		
4 For any individual listed on line 1a, is the organization and related organizations graindividual.	eater than	\$15	0,0	00?	! It	"Yes	5, "	complete Schedu	le J for such	4		
5 Did any person listed on line 1a receive or										7		
for services rendered to the organization? If "Yo										5		
Section B. Independent Contractors	cc, comple	501	·out		01	34011	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	~~				
Complete this table for your five highest components compensation from the organization. Report of the compensation from the organization.												
year.												

(A) Name and business address	(B) Description of services	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶

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Part VII Section A. Officers, Directors, T		y En	рю			and F	ııgı		ea Employees (c	•
(A) Name and title	Average hours per week (list any hours for	box,	unles er and	Pos neck ss pe d a d	rson	e than or	an ee)	(D) Reportable compensation from the	(E) Reportable compensation from related organizations	(F) Estimated amount of other compensation
	related organizations below dotted line)	Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	(W-2/1099-MISC)	from the organization and related organizations
(136) RYAN WILSON	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(137) S. STEPHEN SELIG, III	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(138) SANJAY PAREKH	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(139) SLOANE DRAKE	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(140) STEVE FISHER	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(141) SUZANNE T. PLYBON	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(142) THEODORE I. BLUM	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONI
(143) TIFFANY BURNS	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NONI
(144) TIRRELL D. WHITTLEY	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(145) TYRONE JOHNSON	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
(146) VANESSA ALLEN SUTHERLAND	1.00									
VOTING TRUSTEE	NONE	X						NONE	NONE	NON
to Sub-total c Total from continuation sheets to Part VII, d Total (add lines 1b and 1c) Total number of individuals (including but no	<u> </u>				bove	e) who	▶ ▶ re	ceived more than	\$100,000 of	
reportable compensation from the organizati		= =				,			,	
2 Did the enginetism list and femore of	: din4-		4	4 -				la an hinhaa		Yes No
3 Did the organization list any former of employee on line 1a? If "Yes," complete Sche										3
4 For any individual listed on line 1a, is the organization and related organizations of individual	reater than	\$15	0,0	00?	. If	"Yes	," (complete Schedu	le J for such	4
										7
5 Did any person listed on line 1a receive of for services rendered to the organization? If Section B. Independent Contractors										5
1 Complete this table for your five highest co										

year.

(A) Name and business address	(B) Description of services	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization **>**

Form 000 (2022)

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								D 0	

Part VII Section A. Officers, Directors, T	rustees. Ke	v En	nplo	ve	es.	and I	lia	hest Compensat	ed Emplo	vees (c	Page 8
(A)	(B)	/y <u>_</u>	ipic		C)	una i	···9	(D)	(E)		(F)
Name and title	Average hours per week (list any hours for	box,	unles	Pos heck ss pe	sition mor erson	e than c is both tor/trust	an	Reportable compensation from the	Reporta compensati relate	on from	Estimated amount of other compensation
	related organizations below dotted line)	Ind or c	Institutional trustee	Officer	Key employee	Highest compensated employee	Former	organization (W-2/1099-MISC)	organiza (W-2/1099	I	from the organization and related organizations
147) W. STANLEY BLACKBURN	1.00										
VOTING TRUSTEE	NONE	X						NONE		NONE	NONE
148) WAB P. KADABA	$-\frac{1.00}{NONE}$							NONE		NIONIE	NONE
VOTING TRUSTEE 149) WILLIAM H. LINGINFELTER	1.00	X						NONE	i	NONE	NONE
VOTING TRUSTEE	NONE	X						NONE		NONE	NONE
150) WILLIAM PATE	1.00							110112		110112	210212
VOTING TRUSTEE	NONE	X						NONE	1	NONE	NONE
1b Sub-total											
c Total from continuation sheets to Part VII,	Section A						>				
d Total (add lines 1b and 1c)							o re	ceived more than	\$100,000	of	
reportable compensation from the organizati	on 🕨										
3 Did the organization list any former off employee on line 1a? If "Yes," complete Sche											Yes No
4 For any individual listed on line 1a, is the organization and related organizations of	reater than	\$15	50,0	00?	? It	"Yes	5,"				4
individual5 Did any person listed on line 1a receive of for services rendered to the organization? If "	r accrue co	mpen	sati	on	fron	n any	un				5 X
Section B. Independent Contractors	. 55, Gomple	.0 001	.546		. 101	54011	ادم				
Complete this table for your five highest co compensation from the organization. Report year.											
(A)								(B)			(C)

(A) SEE SCHEDULE O Name and business address	(B) Description of services	(C) Compensation

2 Total number of independent contractors (including but not limited to those listed above) who received more than \$100,000 in compensation from the organization ▶ 16

Part VIII Statement of Revenue

(A) (B) (C) (D) Total revenue Related or exempt Unrelated Revenue excluded function revenue business revenue from tax under sections 512-514 Contributions, Gifts, Grants, and Other Similar Amounts Membership dues 3,197,878 1,032,842. c Fundraising events 1c d Related organizations 639,990. Government grants (contributions) . . 1e All other contributions, gifts, grants, 62,929,109. and similar amounts not included above . 1f g Noncash contributions included in 1g | \$ 11,604,762. lines 1a-1f Total. Add lines 1a-1f 67,799,819 **Business Code** Program Service Revenue PERFORMANCE ARTS TICKETS 711190 14,646,778. 14,646,778 711190 3,815,393 EDUC. PROGRAMS FEES 3,815,393 PARKING REVENUE 711190 2,856,481. 2,841,302 15,179. 711190 MUSEUM EXHIBITIONS 3,296,559. 3,296,559 OTHER REVENUE 711190 1,943,979. 1,943,979 711190 1,541,860 1,541,860 All other program service revenue 28,101,050. g Total. Add lines 2a-2f Investment income (including dividends, interest, and 2,638,025. -2,744,930. 5,382,955. other similar amounts)......... NONE 4 Income from investment of tax-exempt bond proceeds . 5 75,139. 75,139. (ii) Personal (i) Real 4,645,630 6a Gross rents 6a 919,695 b Less: rental expenses 6b c Rental income or (loss) 6c 3,725,935. NONE d Net rental income or (loss)... 3,725,935. -205,755. 3,931,690. Gross amount from (i) Securities (ii) Other sales of assets 51,561,693. 25,000. other than inventory 7a b Less: cost or other basis Other Revenue 7b 58,146,721 and sales expenses -6,585,028. 25,000 c Gain or (loss) 7c -6,560,028. -6,560,028. d Net gain or (loss) 8a Gross income from fundraising 1,032,842. events (not including \$ ___ of contributions reported on line 2,864,533 1c). See Part IV, line 18 8a 935,578 1,928,955. 1,928,955. c Net income or (loss) from fundraising events 9a Gross income from gaming NONE activities. See Part IV, line 19 9b **b** Less: direct expenses c Net income or (loss) from gaming activities..... NONE Gross sales of inventory, less 10a 2,861,160 returns and allowances Net income or (loss) from sales of inventory. 2,108,957. 2,179,631. -70,674. **Business Code** Miscellaneous Revenue 11a d All other revenue NONE e Total. Add lines 11a-11d -3,006,180. 99,817,852. Total revenue. See instructions 30,265,502. 4,758,711.

58-0633971

Part IX Statement of Functional Expenses

Section 501(c)(3) and 501(c)(4) organizations must complete all columns. All other organizations must complete column (A).

	Check if Schedule O contains a resp	onse or note to any line	e in this Part IX		
	not include amounts reported on lines 6b, 7b, 9b, and 10b of Part VIII.	(A) Total expenses	(B) Program service expenses	(C) Management and general expenses	(D) Fundraising expenses
1	Grants and other assistance to domestic organizations	170177			
	and domestic governments. See Part IV, line 21	NONE			
2	Grants and other assistance to domestic	NONTO			
	individuals. See Part IV, line 22	NONE			
3	Grants and other assistance to foreign				
	organizations, foreign governments, and foreign individuals. See Part IV, lines 15 and 16	NONE			
4	Benefits paid to or for members	NONE			
	Compensation of current officers, directors,	NOINE			
3	trustees, and key employees	4,530,538.	3,405,660.	695,866.	429,012.
6	Compensation not included above to disqualified	1700070001	3,103,0001	0,0,000.	12,7,012.
Ü	persons (as defined under section 4958(f)(1)) and				
	persons described in section 4958(c)(3)(B)	NONE			
7	Other salaries and wages	35,836,696.	26,938,875.	5,504,320.	3,393,501.
	Pension plan accruals and contributions (include	1,356,177.	765,830.	590,347.	
-	section 401(k) and 403(b) employer contributions)				
9	Other employee benefits	4,166,089.	3,191,755.	614,284.	360,050.
10	Payroll taxes	2,863,395.	2,234,736.	350,324.	278,335.
11	Fees for services (nonemployees):				
а	Management	NONE			
	Legal	504,738.		504,738.	
c	Accounting	252,986.		252,986.	
d	Lobbying	NONE			
е	Professional fundraising services. See Part IV, line 17.	605,328.			605,328.
f	Investment management fees	610,945.		610,945.	
g	Other. (If line 11g amount exceeds 10% of line 25, column				
	(A), amount, list line 11g expenses on Schedule O.)	3,588,623.	2,928,527.	306,462.	353,634.
	Advertising and promotion	4,314,939.	3,569,338.	229,774.	515,827.
13	Office expenses	1,344,110.	1 240 655	122,618.	1,221,492.
14	Information technology	1,530,704.	1,248,655.	216,683.	65,366
15	Royalties	216,517. 5,307,789.	216,517. 3,838,275.	1,422,906.	46,608
16	Occupancy	2,705,786.	1,901,577.	125,016.	679,193.
	Travel	2,703,700.	1,901,577.	123,010.	079,193.
10	for any federal, state, or local public officials	NONE			
19	Conferences, conventions, and meetings	122,614.	69,954.	39,458.	13,202.
	Interest	8,341,390.	6,842,906.	1,498,177.	307
	Payments to affiliates	NONE	.,,	, , =	20.
	Depreciation, depletion, and amortization	10,893,093.	8,630,049.	2,257,489.	5,555
	Insurance	1,489,312.	210,354.	1,278,798.	160
	Other expenses. Itemize expenses not covered				
	above. (List miscellaneous expenses on line 24e. If				
	line 24e amount exceeds 10% of line 25, column				
	(A), amount, list line 24e expenses on Schedule O.)				
а	SET DESIGN COSTS	10,795,329.	10,795,329.		
	EXHIBITIONS	6,809,056.	6,809,056.		
c	GENERAL ADMINISTRATION	200,980.	9,419.	13,635.	177,926.
d					
	All other expenses				
	Total functional expenses. Add lines 1 through 24e	108,387,134.	83,606,812.	16,634,826.	8,145,496.
26	Joint costs. Complete this line only if the organization reported in column (B) joint costs from a combined educational campaign and fundarious a cligitation. Check host				
	fundraising solicitation. Check here if following SOP 98-2 (ASC 958-720)				

Form **990** (2022)

Form 990 (2022) Page **11**

Part X Balance Sheet

		Check if Schedule O contains a response or note to any line in this P	art X		X
			(A) Beginning of year		(B) End of year
	1	Cash - non-interest-bearing	28,773,473.	1	16,760,642.
	2	Savings and temporary cash investments		2	NONE
	3	Pledges and grants receivable, net	20,638,571.	3	29,873,498.
	4	Accounts receivable, net	18,546,377.	4	18,513,585.
	5	Loans and other receivables from any current or former officer, director,			
		trustee, key employee, creator or founder, substantial contributor, or 35%			
		controlled entity or family member of any of these persons	NONE	5	NONE
	6	Loans and other receivables from other disqualified persons (as defined			
		under section 4958(f)(1)), and persons described in section 4958(c)(3)(B)	NONE	6	NONE
sts	7	Notes and loans receivable, net	NONE	7	NONE
Assets	8	Inventories for sale or use	469,213.	8	483,533.
Ř	9	Prepaid expenses and deferred charges	5,082,800.	9	7,094,480.
	10 a	Land, buildings, and equipment: cost or other			
		basis. Complete Part VI of Schedule D 10a 361,497,686.			
	b	Less: accumulated depreciation	163,489,917. 1	10c	157,470,011.
	11	Investments - publicly traded securities SEE SCHEDULE .O	290,892,626.	11	298,516,160.
	12	Investments - other securities. See Part IV, line 11	120,788,564.	12	108,842,447.
	13	Investments - program-related. See Part IV, line 11.	NONE	13	NONE
	14	Intangible assets	NONE	14	NONE
	15	Other assets. See Part IV, line 11	27,320,010.	15	30,111,157.
	16	Total assets. Add lines 1 through 15 (must equal line 33)	676,001,551.	16	667,665,513.
	17	Accounts payable and accrued expenses	28,330,479.	17	25,755,156.
	18	Grants payable	NONE	18	NONE
	19	Deferred revenue	9,271,093.	19	10,183,546.
	20	Tax-exempt bond liabilities	145,355,139.	20	145,022,968.
	21	Escrow or custodial account liability. Complete Part IV of Schedule D	NONE :	21	NONE
es	22	Loans and other payables to any current or former officer, director,			
Liabilities		trustee, key employee, creator or founder, substantial contributor, or 35%			
abi		controlled entity or family member of any of these persons	NONE :	22	NONE
	23	Secured mortgages and notes payable to unrelated third parties	16,035,000.	23	13,760,000.
	24	Unsecured notes and loans payable to unrelated third parties	NONE :	24	NONE
	25	Other liabilities (including federal income tax, payables to related third			
		parties, and other liabilities not included on lines 17-24). Complete Part X			
		of Schedule D	NONE :	25	NONE
	26	Total liabilities. Add lines 17 through 25	198,991,711.	26	194,721,670.
Seo		Organizations that follow FASB ASC 958, check here and complete lines 27, 28, 32, and 33.			
alar	27	Net assets without donor restrictions	98,699,163.	27	91,378,148.
Ä	28	Net assets with donor restrictions		28	381,565,695.
Net Assets or Fund Balances		Organizations that do not follow FASB ASC 958, check here and complete lines 29 through 33.			
ō	29	Capital stock or trust principal, or current funds		29	
ets	30	Paid-in or capital surplus, or land, building, or equipment fund		30	
} SS	31	Retained earnings, endowment, accumulated income, or other funds		31	
et /	32	Total net assets or fund balances		32	472,943,843.
ž	33	Total liabilities and net assets/fund balances		33	667,665,513.
_			0.0,001,001,		Form 990 (2022)

Form **990** (2022)

orm 990 (2022) Page **12**

OIIII J	70 (2022)				ı u	gc • -
Part	XI Reconciliation of Net Assets					
	Check if Schedule O contains a response or note to any line in this Part XI					. X
1	Total revenue (must equal Part VIII, column (A), line 12)	1	9	9,8	17,	<u>852</u>
2	Total expenses (must equal Part IX, column (A), line 25)	2	10	8,3	87,	<u> 134</u>
3	Revenue less expenses. Subtract line 2 from line 1	3	_	8,5	69,	282
4	Net assets or fund balances at beginning of year (must equal Part X, line 32, column (A))	4	47	7,0	09,	<u>840</u>
5	Net unrealized gains (losses) on investments	5		7,3	68,	<u> 355</u>
6	Donated services and use of facilities	6				
7	Investment expenses	7				
8	Prior period adjustments	8		-4	52,	<u>590</u>
9	Other changes in net assets or fund balances (explain on Schedule O)	9		2,4	<u>12,</u>	<u>480</u>
10	Net assets or fund balances at end of year. Combine lines 3 through 9 (must equal Part X, line					
	32, column (B))	10	47	2,9	43,	<u>843</u>
Part	· · ·					
	Check if Schedule O contains a response or note to any line in this Part XII					
					Yes	No
1	Accounting method used to prepare the Form 990: Cash X Accrual Other					
	If the organization changed its method of accounting from a prior year or checked "Other," ex	plain	on			
	Schedule O.					
2a	Were the organization's financial statements compiled or reviewed by an independent accountant?			2a		_X_
	If "Yes," check a box below to indicate whether the financial statements for the year were com-	piled	or			
	reviewed on a separate basis, consolidated basis, or both:					
	Separate basis Consolidated basis Both consolidated and separate basis					
b	Were the organization's financial statements audited by an independent accountant?			2b	X	
	If "Yes," check a box below to indicate whether the financial statements for the year were audit	ed o	n a			
	separate basis, consolidated basis, or both:					
	Separate basis X Consolidated basis Both consolidated and separate basis					
С	If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for over	rsigh	t of			
	the audit, review, or compilation of its financial statements and selection of an independent accounta	nt?		2c	X	
	If the organization changed either its oversight process or selection process during the tax year, ex	plain	on			
	Schedule O.					
3a	As a result of a federal award, was the organization required to undergo an audit or audits as set for	th in	the			
	Uniform Guidance, 2 C.F.R. Part 200, Subpart F?			3a		_X_
b	If "Yes," did the organization undergo the required audit or audits? If the organization did not und	ergo	the			
	required audit or audits, explain why on Schedule O and describe any steps taken to undergo such au	dits.		3b		

SCHEDULE A (Form 990)

Public Charity Status and Public Support

Complete if the organization is a section 501(c)(3) organization or a section 4947(a)(1) nonexempt charitable trust. Attach to Form 990 or Form 990-EZ.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047 Open to Public Inspection

58-0633971

Department of the Treasury Internal Revenue Service

Name of the organization Employer identification number

ROI	BER:	W. WOODRUFF ARTS	CENTER, INC.				58-0	633971			
Pa	rt I	Reason for Public Ch	arity Status. (All	organizations must	comple	ete this p	oart.) See instruction	is.			
The	orga	anization is not a private fou	ndation because it	is: (For lines 1 through	gh 12, ch	neck only	one box.)				
1		A church, convention of chu	urches, or associa	tion of churches desci	ribed in s	section 1	70(b)(1)(A)(i).				
2		A school described in secti	on 170(b)(1)(A)(ii)	. (Attach Schedule E	(Form 99	90).)					
3		A hospital or a cooperative	hospital service o	rganization described	in sectio	n 170(b)	(1)(A)(iii).				
4		A medical research organiz	•	_				(iii). Enter the			
		hospital's name, city, and st		,	•						
5		An organization operated		a college or universit	v owne	d or ope	erated by a governme	ental unit described in			
-		section 170(b)(1)(A)(iv). (C		g	,		, g				
6		A federal, state, or local go	• ,	rnmental unit describe	d in sec t	tion 170 <i>(</i>	b)(1)(A)(v).				
7	X	An organization that norma	•					om the general public			
•		described in section 170(b)	-	•	pport ii	om a go	vorminorital anni or m	om the general public			
8		A community trust describe		•	Part II \	1					
9		An agricultural research org					I in conjunction with a	land-grant college			
J		or university or a non-land-	=			-	=				
		university:	grant conege or ag	grioditaro (300 matraot	.юпо). С	inter the	name, ony, and state o	i the college of			
10			lly receives (1) mo	ore than 331/3 % of its	sunnort	from co	ntributions membersh	in fees, and gross			
		An organization that normally receives (1) more than 331/3 % of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions, subject to certain exceptions; and (2) no more than 331/3 % of its support from gross investment income and unrelated business taxable income (less section 511 tax) from businesses acquired by the organization after June 30, 1975. See section 509(a)(2). (Complete Part III.)									
11		An organization organized	•	-	_						
12		An organization organized a	•	•			•	, ,			
		one or more publicly suppo	_			•		, ,, ,			
		the box on lines 12a throug					•				
а		☐ Type I. A supporting orga	•	•	•		• , ,				
		the supported organization	on(s) the power to	regularly appoint or e	lect a m	ajority of	f the directors or truste	es of the			
		$_{_{\!$									
b		ot Type II. A supporting org	anization supervise	ed or controlled in co	nnectior	n with its	supported organizati	on(s), by having			
		control or management of	of the supporting o	rganization vested in	the sam	ne persor	ns that control or mar	age the supported			
		_ organization(s). You must	complete Part IV	, Sections A and C.							
С		ot Type III functionally integrates	grated. A supporti	ng organization opera	ited in c	onnectio	n with, and functiona	lly integrated with,			
		$_{\lnot}$ its supported organizatior		•							
d			integrated. A sup	porting organization o	perated	in conn	ection with its suppor	ted organization(s)			
		that is not functionally inte	egrated. The orgar	nization generally mus	st satisfy	a distrib	oution requirement and	d an attentiveness			
		$_{\lnot}$ requirement (see instruct	ions). You must co	omplete Part IV, Sect	ions A a	ınd D, an	d Part V.				
е		ot Check this box if the orga					•••	I, Type III			
		functionally integrated, or		ionally integrated sup	porting o	organizat	tion.				
f		ter the number of supported	•								
g		ovide the following information		` '	1		Г				
	(i) N	ame of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1-10		organization our governing	(v) Amount of monetary	(vi) Amount of			
				above (see instructions))		ment?	support (see instructions)	other support (see instructions)			
					Yes	No					
(A)											
(B)											
(C)											
(D)											
(E)											
(-)											
Tota	ıl										

Part II Support Schedule for Organizations Described in Sections 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi) (Complete only if you checked the box on line 5, 7, or 8 of Part I or if the organization failed to qualify under Part III. If the organization fails to qualify under the tests listed below, please complete Part III.)

Sec	tion A. Public Support						
Cale	ndar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
1	Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")	45,267,676.	31,384,129.	44,967,189.	72,106,220.	67,799,819.	261,525,033.
2	Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						NONE
3	The value of services or facilities furnished by a governmental unit to the organization without charge						NONE
4	Total. Add lines 1 through 3	45,267,676.	31,384,129.	44,967,189.	72,106,220.	67,799,819.	261,525,033.
5	The portion of total contributions by each person (other than a governmental unit or publicly supported organization) included on line 1 that exceeds 2% of the amount						
	shown on line 11, column (f)						29,662,684.
_6	Public support. Subtract line 5 from line 4						231,862,349.
	tion B. Total Support						
Cale	ndar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
7	Amounts from line 4	45,267,676.	31,384,129.	44,967,189.	72,106,220.	67,799,819.	261,525,033.
8	Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources	8,544,860.	7,595,839.	4,687,187.	2,953,368.	7,358,794.	31,140,048.
9	Net income from unrelated business activities, whether or not the business is regularly carried on	702,778.	974,344.	1,755,187.	2,796,362.	1,928,955.	8,157,626.
10	Other income. Do not include gain or loss from the sale of capital assets (Explain in Part VI.)SEE SUPP .PAGE	NONE	2,811,687.	471,673.	NONE	NONE	3,283,360.
11	Total support. Add lines 7 through 10						304,106,067.
12	Gross receipts from related activities, etc. (s	see instructions) .				12	123,099,252.
13	First 5 years. If the Form 990 is for organization, check this box and stop here	<u> </u>		, third, fourth,	or fifth tax yea	ar as a section	501(c)(3)
	tion C. Computation of Public Sup						
14	Public support percentage for 2022 (li	. ,	•			14	76.24 %
15	Public support percentage from 2021					15	74.15 %
16a	331/3% support test - 2022. If the org	•					
_	box and stop here. The organization q						
b	33 1/3 % support test - 2021. If the org						
	this box and stop here . The organization			_			
17a	10%-facts-and-circumstances test - 2						
	10% or more, and if the organization					•	•
	Part VI how the organization meets			_			
	organization						
b	10%-facts-and-circumstances test - 2	_					
	15 is 10% or more, and if the organize					-	
	in Part VI how the organization meets			•	•		
	organization						
18	Private foundation. If the organization						
	instructions						<u> </u>

Part III Support Schedule for Organizations Described in Section 509(a)(2)

(Complete only if you checked the box on line 10 of Part I or if the organization failed to qualify under Part II. If the organization fails to qualify under the tests listed below, please complete Part II.)

				· · ·	•	,	
	tion A. Public Support	(2) 2019	(b) 2010	(a) 2020	(4) 2021	(a) 2022	(f) Total
_	ndar year (or fiscal year beginning in)	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(I) Total
1	Gifts, grants, contributions, and membership fees						
•	received. (Do not include any "unusual grants.")						
2	Gross receipts from admissions, merchandise						
	sold or services performed, or facilities						
	furnished in any activity that is related to the						
_	organization's tax-exempt purpose						
3	Gross receipts from activities that are not an						
	unrelated trade or business under section 513						
4	Tax revenues levied for the						
	organization's benefit and either paid to						
_	or expended on its behalf						
5	The value of services or facilities						
	furnished by a governmental unit to the						
_	organization without charge						
6	Total. Add lines 1 through 5						
7 a	Amounts included on lines 1, 2, and 3						
h	received from disqualified persons Amounts included on lines 2 and 3						
ь	received from other than disqualified						
	persons that exceed the greater of \$5,000						
	or 1% of the amount on line 13 for the year						
	Add lines 7a and 7b						
8	Public support. (Subtract line 7c from						
800	line 6.)						
	tion B. Total Support	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
	ndar year (or fiscal year beginning in)	(a) 2010	(b) 2019	(6) 2020	(u) 2021	(6) 2022	(i) Total
9 10 a	Amounts from line 6						
b	Unrelated business taxable income (less						
_	section 511 taxes) from businesses						
	acquired after June 30, 1975						
С	Add lines 10a and 10b						
11	Net income from unrelated business						
•	activities not included on line 10b, whether						
	or not the business is regularly carried on.						
12							
12	Other income. Do not include gain or loss from the sale of capital assets						
	(Explain in Part VI.)						
13	Total support. (Add lines 9, 10c, 11,	,					
-	and 12.)						
14	First 5 years. If the Form 990 is for	the organizat	ion's first. secon	d, third, fourth.	or fifth tax ve	ear as a section	501(c)(3)
	organization, check this box and stop here.	•			•		` ` ` ` _
Sec	tion C. Computation of Public Supp						
15	Public support percentage for 2022 (line 8,	column (f), divid	ded by line 13, colu	ımn (f))		15	%
16	Public support percentage from 2021 Sche		-			16	%
Sec	tion D. Computation of Investment					'	
17	Investment income percentage for 2022 (lin			13, column (f))		17	%
18	Investment income percentage from 2021 S					18	%
	331/3% support tests - 2022. If the org						
	17 is not more than 331/3%, check this	-					
b	331/3% support tests - 2021. If the orga		_				
-	line 18 is not more than 331/3%, check						
20	Private foundation. If the organization of		•			0	

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Part IV Supporting Organizations

(Complete only if you checked a box on line 12 of Part I. If you checked box 12a, Part I, complete Sections A and B. If you checked box 12b, Part I, complete Sections A and C. If you checked box 12c, Part I, complete Sections A, D, and E. If you checked box 12d, Part I, complete Sections A and D, and complete Part V.)

Section A. All Supporting Organizations

- Are all of the organization's supported organizations listed by name in the organization's governing documents? If "No," describe in **Part VI** how the supported organizations are designated. If designated by class or purpose, describe the designation. If historic and continuing relationship, explain.
- 2 Did the organization have any supported organization that does not have an IRS determination of status under section 509(a)(1) or (2)? If "Yes," explain in **Part VI** how the organization determined that the supported organization was described in section 509(a)(1) or (2).
- **3a** Did the organization have a supported organization described in section 501(c)(4), (5), or (6)? If "Yes," answer lines 3b and 3c below.
- **b** Did the organization confirm that each supported organization qualified under section 501(c)(4), (5), or (6) and satisfied the public support tests under section 509(a)(2)? If "Yes," describe in **Part VI** when and how the organization made the determination.
- c Did the organization ensure that all support to such organizations was used exclusively for section 170(c)(2)(B) purposes? If "Yes," explain in **Part VI** what controls the organization put in place to ensure such use.
- 4a Was any supported organization not organized in the United States ("foreign supported organization")? If "Yes," and if you checked box 12a or 12b in Part I, answer lines 4b and 4c below.
- **b** Did the organization have ultimate control and discretion in deciding whether to make grants to the foreign supported organization? If "Yes," describe in **Part VI** how the organization had such control and discretion despite being controlled or supervised by or in connection with its supported organizations.
- c Did the organization support any foreign supported organization that does not have an IRS determination under sections 501(c)(3) and 509(a)(1) or (2)? If "Yes," explain in **Part VI** what controls the organization used to ensure that all support to the foreign supported organization was used exclusively for section 170(c)(2)(B) purposes.
- 5a Did the organization add, substitute, or remove any supported organizations during the tax year? If "Yes," answer lines 5b and 5c below (if applicable). Also, provide detail in **Part VI**, including (i) the names and EIN numbers of the supported organizations added, substituted, or removed; (ii) the reasons for each such action; (iii) the authority under the organization's organizing document authorizing such action; and (iv) how the action was accomplished (such as by amendment to the organizing document).
- **b** Type I or Type II only. Was any added or substituted supported organization part of a class already designated in the organization's organizing document?
- c Substitutions only. Was the substitution the result of an event beyond the organization's control?
- 6 Did the organization provide support (whether in the form of grants or the provision of services or facilities) to anyone other than (i) its supported organizations, (ii) individuals that are part of the charitable class benefited by one or more of its supported organizations, or (iii) other supporting organizations that also support or benefit one or more of the filing organization's supported organizations? If "Yes," provide detail in Part VI.
- 7 Did the organization provide a grant, loan, compensation, or other similar payment to a substantial contributor (as defined in section 4958(c)(3)(C)), a family member of a substantial contributor, or a 35% controlled entity with regard to a substantial contributor? If "Yes," complete Part I of Schedule L (Form 990).
- 8 Did the organization make a loan to a disqualified person (as defined in section 4958) not described on line 7? If "Yes," complete Part I of Schedule L (Form 990).
- 9a Was the organization controlled directly or indirectly at any time during the tax year by one or more disqualified persons, as defined in section 4946 (other than foundation managers and organizations described in section 509(a)(1) or (2))? If "Yes," provide detail in Part VI.
- **b** Did one or more disqualified persons (as defined on line 9a) hold a controlling interest in any entity in which the supporting organization had an interest? If "Yes," provide detail in **Part VI.**
- c Did a disqualified person (as defined on line 9a) have an ownership interest in, or derive any personal benefit from, assets in which the supporting organization also had an interest? If "Yes," provide detail in **Part VI.**
- 10 a Was the organization subject to the excess business holdings rules of section 4943 because of section 4943(f) (regarding certain Type II supporting organizations, and all Type III non-functionally integrated supporting organizations)? If "Yes," answer line 10b below.
 - **b** Did the organization have any excess business holdings in the tax year? (Use Schedule C, Form 4720, t determine whether the organization had excess business holdings.)

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Page 5 Schedule A (Form 990) 2022

Part	V Supporting Organizations (continued)			
			Yes	No
11	Has the organization accepted a gift or contribution from any of the following persons?			
а	A person who directly or indirectly controls, either alone or together with persons described on lines 11b and			
	11c below, the governing body of a supported organization?	11a		
b	A family member of a person described on line 11a above?	11b		
С	A 35% controlled entity of a person described on line 11a or 11b above? If "Yes" to line 11a, 11b, or 11c,			
	provide detail in Part VI.	11c		
Secti	on B. Type I Supporting Organizations			
			Yes	No
1	Did the governing body, members of the governing body, officers acting in their official capacity, or membership of one or more supported organizations have the power to regularly appoint or elect at least a majority of the organization's officers, directors, or trustees at all times during the tax year? If "No," describe in Part VI how the supported organization(s) effectively operated, supervised, or controlled the organization's activities. If the organization had more than one supported organization, describe how the powers to appoint and/or remove officers, directors, or trustees were allocated among the supported organizations and what conditions or restrictions, if any, applied to such powers during the tax year.	1		
2	Did the organization operate for the benefit of any supported organization other than the supported organization(s) that operated, supervised, or controlled the supporting organization? If "Yes," explain in Part VI how providing such benefit carried out the purposes of the supported organization(s) that operated, supervised, or controlled the supporting organization.	2		
Secti	on C. Type II Supporting Organizations			
			Yes	No
1	Were a majority of the organization's directors or trustees during the tax year also a majority of the directors or trustees of each of the organization's supported organization(s)? If "No," describe in Part VI how control or management of the supporting organization was vested in the same persons that controlled or managed the supported organization(s).	1		
Secti	on D. All Type III Supporting Organizations			
	7,		Yes	No
1	Did the organization provide to each of its supported organizations, by the last day of the fifth month of the organization's tax year, (i) a written notice describing the type and amount of support provided during the prior tax year, (ii) a copy of the Form 990 that was most recently filed as of the date of notification, and (iii) copies of the organization's governing documents in effect on the date of notification, to the extent not previously provided?	1		
2	Were any of the organization's officers, directors, or trustees either (i) appointed or elected by the supported organization(s) or (ii) serving on the governing body of a supported organization? If "No," explain in Part VI how the organization maintained a close and continuous working relationship with the supported organization(s).	2		
3	By reason of the relationship described on line 2, above, did the organization's supported organizations have a significant voice in the organization's investment policies and in directing the use of the organization's income or assets at all times during the tax year? If "Yes," describe in Part VI the role the organization's supported organizations played in this regard.	3		
Secti	on E. Type III Functionally Integrated Supporting Organizations			
1	Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see in	structi	ons).	
a	The organization satisfied the Activities Test. Complete line 2 below.			
b	The organization is the parent of each of its supported organizations. <i>Complete line 3 below.</i>			
С	The organization supported a governmental entity. Describe in Part VI how you supported a governmental entity (see	e instr	uctions	s).
			Yes	
2	Activities Test. Answer lines 2a and 2b below.			
а	Did substantially all of the organization's activities during the tax year directly further the exempt purposes of the supported organization(s) to which the organization was responsive? If "Yes," then in Part VI identify those supported organizations and explain how these activities directly furthered their exempt purposes, how the organization was responsive to those supported organizations, and how the organization determined that these activities constituted substantially all of its activities.	2a		
b	Did the activities described on line 2a, above, constitute activities that, but for the organization's involvement, one or more of the organization's supported organization(s) would have been engaged in? If "Yes," explain in Part VI the reasons for the organization's position that its supported organization(s) would have engaged in these activities but for the organization's involvement.	2b		
3	Parent of Supported Organizations. <i>Answer lines 3a and 3b below.</i>			
а	Did the organization have the power to regularly appoint or elect a majority of the officers, directors, or trustees of each of the supported organizations? If "Yes" or "No," provide details in Part VI .	3a		
b	Did the organization exercise a substantial degree of direction over the policies, programs, and activities of each			
	of its supported argenizations? If IV/as II describe in Dort VI the role played by the argenization in this regard			i

Page 6 Schedule A (Form 990) 2022

Pa	art V Type III Non-Functionally Integrated 509(a)(3) Supporting Organ	nizations	S				
1	1 Check here if the organization satisfied the Integral Part Test as a qualifying trust on Nov. 20, 1970 (explain in Part VI). See						
	instructions. All other Type III non-functionally integrated supporting organizations must complete Sections A through E.						
Se	ection A - Adjusted Net Income	(A) Prior Year	(B) Current Year (optional)				
1	Net short-term capital gain	1					
2	Recoveries of prior-year distributions	2					
3	Other gross income (see instructions)	3					
4	Add lines 1 through 3.	4					
5	Depreciation and depletion	5					
6	Portion of operating expenses paid or incurred for production or collection						
	of gross income or for management, conservation, or maintenance of						
	property held for production of income (see instructions)	6					
7	Other expenses (see instructions)	7					
		8					
	ection B - Minimum Asset Amount		(A) Prior Year	(B) Current Year (optional)			
1	Aggregate fair market value of all non-exempt-use assets (see						
	instructions for short tax year or assets held for part of year):						
a	Average monthly value of securities	1a					
b	Average monthly cash balances	1b					
	Fair market value of other non-exempt-use assets	1c					
d	Total (add lines 1a, 1b, and 1c)	1d					
	Discount claimed for blockage or other factors						
	(explain in detail in Part VI):						
2	Acquisition indebtedness applicable to non-exempt-use assets	2					
	Subtract line 2 from line 1d.	3					
4	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount, see instructions).	4					
5	Net value of non-exempt-use assets (subtract line 4 from line 3)	5					
	Multiply line 5 by 0.035.	6					
	Recoveries of prior-year distributions	7					
8		8					
Se	ection C - Distributable Amount			Current Year			
1	Adjusted net income for prior year (from Section A, line 8, column A)	1					
	Enter 0.85 of line 1.	2					
3	Minimum asset amount for prior year (from Section B, line 8, column A)	3					
4	Enter greater of line 2 or line 3.	4					
5	Income tax imposed in prior year	5					
6	Distributable Amount. Subtract line 5 from line 4, unless subject to						
J	emergency temporary reduction (see instructions).	6					
7	Check here if the current year is the organization's first as a non-functional		ted Type III supporting	g organization			
-	(see instructions).	,	.) [cappedim]	J			

Schedule A (Form 990) 2022

Part		Supporting Organizat	tions (continued)		
Sect	ion D - Distributions				Current Year
1	Amounts paid to supported organizations to accomplish ex	xempt purposes		1	
2	Amounts paid to perform activity that directly furthers exer				
	organizations, in excess of income from activity	2			
3	Administrative expenses paid to accomplish exempt purpo	ses of supported organi	zations	3	
4	Amounts paid to acquire exempt-use assets			4	
5	Qualified set-aside amounts (prior IRS approval required - p	rovide details in Part VI)		5	
6	Other distributions (describe in Part VI). See instructions.			6	
7	Total annual distributions. Add lines 1 through 6.			7	
8	Distributions to attentive supported organizations to which	the organization is resp	onsive		
	(provide details in Part VI). See instructions.			8	
9	Distributable amount for 2022 from Section C, line 6			9	
10	Line 8 amount divided by line 9 amount			10	
Sect	tion E - Distribution Allocations (see instructions) (i) Excess Distributions Underd		(ii) Underdistribution Pre-2022	s	(iii) Distributable Amount for 2022
1	Distributable amount for 2022 from Section C, line 6				
2	Underdistributions, if any, for years prior to 2022				
	(reasonable cause required - explain in Part VI). See				
	instructions.				
3	Excess distributions carryover, if any, to 2022				
а	From 2017				
b	From 2018				
С	From 2019				
d	From 2020				
е	From 2021				
f	Total of lines 3a through 3e				
g	Applied to underdistributions of prior years				
h	Applied to 2022 distributable amount				
i	Carryover from 2017 not applied (see instructions)				
j	Remainder. Subtract lines 3g, 3h, and 3i from line 3f.				
4	Distributions for 2022 from				
	Section D, line 7: \$				
а	Applied to underdistributions of prior years				
b	Applied to 2022 distributable amount				
С	Remainder. Subtract lines 4a and 4b from line 4.				
5	Remaining underdistributions for years prior to 2022, if				
	any. Subtract lines 3g and 4a from line 2. For result				
	greater than zero, explain in Part VI. See instructions.				
6	Remaining underdistributions for 2022. Subtract lines 3h				
	and 4b from line 1. For result greater than zero, explain in				
	Part VI. See instructions.				
7	Excess distributions carryover to 2023. Add lines 3j				
	and 4c.				
8	Breakdown of line 7:				

Schedule A (Form 990) 2022

a Excess from 2018....
b Excess from 2019....
c Excess from 2020....
d Excess from 2021....
e Excess from 2022....

Schedule A (Form 990 or 990-EZ) 2022

Part VI Supplemental Information. Provide the explanations required by Part II, line 10; Part II, line 17a or 17b; Part III, line 12; Part IV, Section A, lines 1, 2, 3b, 3c, 4b, 4c, 5a, 6, 9a, 9b, 9c, 11a, 11b, and 11c; Part IV, Section B, lines 1 and 2; Part IV, Section C, line 1; Part IV, Section D, lines 2 and 3; Part IV, Section E, lines 1c, 2a, 2b, 3a and 3b; Part V, line 1; Part V, Section B, line 1e; Part V, Section D, lines 5, 6, and 8; and Part V, Section E, lines 2, 5, and 6. Also complete this part for any additional information. (See instructions.)

SCHEDULE A, PART II - OTHER INCOM	ΊΕ					
DESCRIPTION	2018	2019	2020	2021	2022	TOTAL
MISCELLANEOUS INCOME	NONE	2,811,687.	471,673.	NONE	NONE	3,283,360.
TOTALS =:	NONE	2,811,687.	471,673.	NONE	NONE	3,283,360.

Department of the Treasury

Internal Revenue Service

Schedule of Contributors

Go to www.irs.gov/Form990 for the latest information.

Attach to Form 990 or Form 990-PF.

OMB No. 1545-0047

2022

Employer identification number Name of the organization ROBERT W. WOODRUFF ARTS CENTER, 58-0633971 Organization type (check one): Filers of: Section: X Form 990 or 990-EZ 501(c)(3) (enter number) organization 4947(a)(1) nonexempt charitable trust not treated as a private foundation 527 political organization Form 990-PF 501(c)(3) exempt private foundation 4947(a)(1) nonexempt charitable trust treated as a private foundation 501(c)(3) taxable private foundation Check if your organization is covered by the General Rule or a Special Rule. Note: Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule. See instructions. **General Rule** For an organization filing Form 990, 990-EZ, or 990-PF that received, during the year, contributions totaling \$5,000 or more (in money or property) from any one contributor. Complete Parts I and II. See instructions for determining a contributor's total contributions. **Special Rules** For an organization described in section 501(c)(3) filing Form 990 or 990-EZ that met the 33 1/3% support test of the regulations under sections 509(a)(1) and 170(b)(1)(A)(vi), that checked Schedule A (Form 990), Part II, line 13, 16a, or 16b, and that received from any one contributor, during the year, total contributions of the greater of (1) \$5,000; or (2) 2% of the amount on (i) Form 990, Part VIII, line 1h; or (ii) Form 990-EZ, line 1. Complete Parts I and II. For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, total contributions of more than \$1,000 exclusively for religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals. Complete Parts I (entering "N/A" in column (b) instead of the contributor name and address), II, and III. For an organization described in section 501(c)(7), (8), or (10) filing Form 990 or 990-EZ that received from any one contributor, during the year, contributions exclusively for religious, charitable, etc., purposes, but no such contributions totaled more than \$1,000. If this box is checked, enter here the total contributions that were received during the year for an exclusively religious, charitable, etc., purpose. Don't complete any of the parts unless the General Rule applies to this organization because it received nonexclusively religious, charitable, etc., contributions Caution: An organization that isn't covered by the General Rule and/or the Special Rules doesn't file Schedule B (Form 990), but it must answer "No" on Part IV, line 2, of its Form 990; or check the box on line H of its Form 990-EZ or on its Form 990-PF, Part I, line

For Paperwork Reduction Act Notice, see the instructions for Form 990, 990-EZ, or 990-PF.

2, to certify that it doesn't meet the filing requirements of Schedule B (Form 990).

Schedule B (Form 990) (2022)

Name of organization ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number 58-0633971

Part I	Contributors	(see instructions).	Use duplicate copies	of Part I if additional	space is needed.
--------	--------------	---------------------	----------------------	-------------------------	------------------

(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
1_	N/A	\$24,000,000.	Person X Payroll X Noncash X (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
2	N/A	\$1,642,392.	Person X Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)
(a) No.	(b) Name, address, and ZIP + 4	(c) Total contributions	(d) Type of contribution
		\$	Person Payroll Noncash (Complete Part II for noncash contributions.)

Name of organization ${\tt ROBERT\ W.\ WOODRUFF\ ARTS\ CENTER,\ INC.}$

Employer identification number 58-0633971

Part II Noncash Property (see instructions). Use duplicate copies of Part II if additional space is needed.

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
1	STOCKS		
		\$10,060,858.	05/31/2023
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	
(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (See instructions.)	(d) Date received
		\$	

Name of organization Employer identification number ROBERT W. WOODRUFF ARTS CENTER, INC. 58-0633971 Part III Exclusively religious, charitable, etc., contributions to organizations described in section 501(c)(7), (8), or (10) that total more than \$1,000 for the year from any one contributor. Complete columns (a) through (e) and the following line entry. For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of **\$1,000 or less** for the year. (Enter this information once. See instructions.) \$ Use duplicate copies of Part III if additional space is needed. (a) No. from (b) Purpose of gift (c) Use of gift (d) Description of how gift is held (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee (a) No. from (b) Purpose of gift (c) Use of gift (d) Description of how gift is held (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee (a) No. from (b) Purpose of gift (c) Use of gift (d) Description of how gift is held Part I (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee (a) No. (b) Purpose of gift (c) Use of gift (d) Description of how gift is held from Part I (e) Transfer of gift Transferee's name, address, and ZIP + 4 Relationship of transferor to transferee

JSA

SCHEDULE C (Form 990)

Political Campaign and Lobbying Activities

For Organizations Exempt From Income Tax Under section 501(c) and section 527

Complete if the organization is described below. Attach to Form 990 or Form 990-EZ. Go to www.irs.gov/Form990 for instructions and the latest information.

Open to Public Inspection

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service

If the organization answered "Yes," on Form 990, Part IV, line 3, or Form 990-EZ, Part V, line 46 (Political Campaign Activities), then

- Section 501(c)(3) organizations: Complete Parts I-A and B. Do not complete Part I-C.
- Section 501(c) (other than section 501(c)(3)) organizations: Complete Parts I-A and C below. Do not complete Part I-B.
- Section 527 organizations: Complete Part I-A only.

If the organization answered "Yes," on Form 990, Part IV, line 4, or Form 990-EZ, Part VI, line 47 (Lobbying Activities), then

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)): Complete Part II-A. Do not complete Part II-B.
- Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.

	e organization answered "Yes," (See separate instructions), the	on Form 990, Part IV, line 5 (Proxy n	Tax) (See separate in	istructions) or Form 990-1	EZ, Part V, line 35c (Prox
•	Section 501(c)(4), (5), or (6) orga	anizations: Complete Part III.			
Nam	e of organization			Employer ide	ntification number
ROE	BERT W. WOODRUFF ARTS				533971
Par	t I-A Complete if the o	organization is exempt under	section 501(c) or i	s a section 527 organ	nization.
1	Provide a description of the	he organization's direct and indi	rect political camp	aign activities in Part	IV. See instructions for
	definition of "political campa	aign activities."			
2		xpenditures. See instructions			
3		campaign activities. See instructio			
Par		organization is exempt under s			
1	Enter the amount of any exc	cise tax incurred by the organizatio	n under section 495	5 \$	
2		cise tax incurred by organization m			
3		a section 4955 tax, did it file Form	-		
4a	Was a correction made?				Yes No
	If "Yes," describe in Part IV.				
Par	t I-C Complete if the c	organization is exempt under	section 501(c), ex	cept section 501(c)(3	<u>). </u>
1		xpended by the filing organization			
2		ng organization's funds contributed			
		es			
3		enditures. Add lines 1 and 2. Ent			
	line 17b			\$	
4		e Form 1120-POL for this year?			
5		and employer identification numb s. For each organization listed, en			
		tributions received that were prom			
		nd or a political action committee (
	(a) Name	(b) Address	(c) EIN	(d) Amount paid from	(e) Amount of political
	(2)	(2) / (22. 555	(0) = (filing organization's	contributions received and
				funds. If none, enter -0	promptly and directly
					delivered to a separate
					political organization. If none, enter -0
					,
(1)			_		
(2)			_		
(3)			_		
(4)					
(4)			-		
(E)					
(5)			-		
(C)					
(6)			-		
		1	1	I	

For Paperwork Reduction Act Notice, see the Instructions for Form 990 or 990-EZ.

Schedule C (Form 990) 2022

301	riedule C (Folili 990) 2022 RO	DEKI	W. WOOD	KOLL AKID CEN	IEK, INC.	30	-00339/1 Fage 2
P	art II-A Complete if the organ section 501(h)).						
Α	Check if the filing organization EIN, expenses, and		•	• , ,		ach affiliated group mem	ber's name, address
В	Check if the filing organization	ion che	ecked box A	A and "limited contro	l" provisions app	ly.	
			ying Expend			(a) Filing	(b) Affiliated
	(The term "expenditure	es" me	eans amour	nts paid or incurred.)	organization's totals	group totals
18	a Total lobbying expenditures to influence	uence	public opini	on (grassroots lobb	ying)		
			a legislative body (direct lobbying)				
	c Total lobbying expenditures (add l						
	d Other exempt purpose expenditure						
	e Total exempt purpose expenditure			•			
f	f Lobbying nontaxable amount. Er	iter the	e amount f	from the following	table in both		
	columns.						
	If the amount on line 1e, column (a) or	r (b) is:			is:		
	Not over \$500,000	20		amount on line 1e.	#500.000		
	Over \$500,000 but not over \$1,000,00			us 15% of the excess			
	Over \$1,000,000 but not over \$1,500,			us 10% of the excess			
	Over \$1,500,000 but not over \$17,000 Over \$17,000,000	0,000	\$1,000,000	us 5% of the excess of	ver \$1,500,000.		
_	g Grassroots nontaxable amount (e	nter 25					
	h Subtract line 1g from line 1a. If ze						
	i Subtract line 1f from line 1c. If zer						
	j If there is an amount other than					tion file Form 4720	
•	reporting section 4911 tax for this				_		Yes No
	1 3			aging Period Under			
	(Some organizations that n	nade a	section 50	1(h) election do no	t have to compl	ete all of the five colun	nns below.
		See	the separat	te instructions for I	ines 2a through	2f.)	
_		Lobb	ying Exper	nditures During 4-Ye	ear Averaging Pe	riod	
	Calendar year (or fiscal year beginning in)	(a)	2019	(b) 2020	(c) 2021	(d) 2022	(e) Total
28	a Lobbying nontaxable amount						
	b Lobbying ceiling amount (150% of line 2a, column (e))						
_	c Total lobbying expenditures						
_	d Grassroots nontaxable amount						
_	e Grassroots ceiling amount (150% of line 2d, column (e))						
f	f Grassroots lobbying expenditures						

Part II-B	Complete if the organization is exempt under section 501(c)(3) and has NOT filed Form 5768
	(election under section 501(h)).

descripti						
descripti	h "Yes," response on lines 1a through 1i below, provide in Part IV a detailed	(8	a)		(b)	
	ion of the lobbying activity.	Yes	No		Amount	
	ring the year, did the filing organization attempt to influence foreign, national, state, or local					
	slation, including any attempt to influence public opinion on a legislative matter or					
	erendum, through the use of:	37				
	unteers?	X				
	d staff or management (include compensation in expenses reported on lines 1c through 1i)?.	X	37			
	dia advertisements?	37	X			NONTE
	ilings to members, legislators, or the public?	X	37			NONE
	plications, or published or broadcast statements?		X			
	ants to other organizations for lobbying purposes?	- V				NONTE
_	ect contact with legislators, their staffs, government officials, or a legislative body?	X	Х			NONE
	lies, demonstrations, seminars, conventions, speeches, lectures, or any similar means?					
	ner activities?		X			MONTE
-	al. Add lines 1c through 1i		37			NONE
	the activities in line 1 cause the organization to be not described in section 501(c)(3)?		X			
	/es," enter the amount of any tax incurred under section 4912					
	e filing organization incurred a section 4912					
Part III-		(c)(5)	ors	oction		
T art III-	501(c)(6).	(6)(3)	, or s	CUOII		
					Yes	No
1 We	re substantially all (90% or more) dues received nondeductible by members?				1	†
2 Did	the organization make only in-house lobbying expenditures of \$2,000 or less?				2	
	the organization agree to carry over lobbying and political campaign activity expenditures fro				3	
Part III-	B Complete if the organization is exempt under section 501(c)(4), section 501	(c)(5)	, or s	ection		
	501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No"	OR (k) Pa	rt III-A, li	ne 3, is	
	answered "Yes."					
1 Due	es, assessments and similar amounts from members			1		
2 Sec	ction 162(e) nondeductible lobbying and political expenditures (do not include amou	ınts	of			
poli	itical expenses for which the section 527(f) tax was paid).					
- 0	rent year					
a Cur				2a		
	ryover from last year			2b		
b Car	ryover from last year			2b 2c		
b Carc Tota3 Agg	al	 es		2b		
b Carc Tota3 Agg	al	 es		2b 2c		
b Carc Tota3 Agg4 If n	al	es of th	 ne	2b 2c 3		
b Car c Tota 3 Agg 4 If n excent	al	es of th	ne ng	2b 2c 3		
b Car c Tota 3 Agg 4 If n excent	al	es of th	ne ng	2b 2c 3		

SCHEDULE D (Form 990)

Supplemental Financial Statements Complete if the organization answered "Yes" on Form 990,

Part IV, line 6, 7, 8, 9, 10, 11a, 11b, 11c, 11d, 11e, 11f, 12a, or 12b.

Attach to Form 990.

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047 **Open to Public** Inspection

Department of the Treasury Internal Revenue Service

Nam	e of the organization		Employer identification number
ROI	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971
	organizations Maintaining Donor Advised Funds or O	ther Similar Funds of	
	Complete if the organization answered "Yes" on Form 9		
		advised funds	(b) Funds and other accounts
1	Total number at end of year		
2	Aggregate value of contributions to (during year)		
3	Aggregate value of grants from (during year)		
4	Aggregate value at end of year.		
5	Did the organization inform all donors and donor advisors in writin	a that the assets held	d in donor advised
•	funds are the organization's property, subject to the organization's ex	-	
6	Did the organization inform all grantees, donors, and donor advisors	_	
•	only for charitable purposes and not for the benefit of the donor or		
	conferring impermissible private benefit?		
P	art II Conservation Easements.		
	Complete if the organization answered "Yes" on Form 9	90, Part IV, line 7.	
1	Purpose(s) of conservation easements held by the organization (chec		
	Preservation of land for public use (for example, recreation or education		n of a historically important land area
	Protection of natural habitat		n of a certified historic structure
	Preservation of open space		
2	Complete lines 2a through 2d if the organization held a qualified con-	servation contribution	in the form of a conservation
_	easement on the last day of the tax year.		Held at the End of the Tax Year
а	Total number of conservation easements		2a
b	Total acreage restricted by conservation easements		2b
C	Number of conservation easements on a certified historic structure in		2c
d	Number of conservation easements on a certified historic structure in Number of conservation easements included in (c) acquired after Jul		
u	a historic structure listed in the National Register	=	2d
3	Number of conservation easements modified, transferred, released		
J	tax year	, extiliguished, of teri	illiated by the organization during the
4	Number of states where property subject to conservation easement is	s located	
5	Does the organization have a written policy regarding the period		ction handling of
J	violations, and enforcement of the conservation easements it holds?		-
6	Staff and volunteer hours devoted to monitoring, inspecting, handling of		
•	otali and volunteer hours devoted to monitoring, inspecting, handling or	violations, and emoroni	g conservation casements during the year
7	Amount of expenses incurred in monitoring, inspecting, handling of vice	lations, and enforcing	conservation easements during the year
•	, g, g, g, g, g, g	nations, and onlong	
8	Does each conservation easement reported on line 2(d) above satisfy the	ne requirements of sec	tion 170(h)(4)(B)(i)
	and section 170(h)(4)(B)(ii)?		
9	In Part XIII, describe how the organization reports conservation		
	balance sheet, and include, if applicable, the text of the footnote to		
	organization's accounting for conservation easements.	· ·	
Pa	art III Organizations Maintaining Collections of Art, Historica		er Similar Assets.
	Complete if the organization answered "Yes" on Form 9	90, Part IV, line 8.	
1a	If the organization elected, as permitted under FASB ASC 958, not of art, historical treasures, or other similar assets held for public	to report in its reven	ue statement and balance sheet works
	of art, historical treasures, or other similar assets held for public service, provide in Part XIII the text of the footnote to its financial stat	exhibition, education	n, or research in furtherance of public
L	•		
b	If the organization elected, as permitted under FASB ASC 958, to art, historical treasures, or other similar assets held for public exhib		
	provide the following amounts relating to these items:	, oddodion, or ro	222. 3.7 III Taranoranoo or public dorvido,
	(i) Revenue included on Form 990, Part VIII, line 1		\$
	(ii) Assets included in Form 990, Part X		\$
2	If the organization received or held works of art, historical treas		
	following amounts required to be reported under FASB ASC 958 rela		J, p
а			\$
b	Revenue included on Form 990, Part VIII, line 1		\$

	L L D (5					
	rt III Organizations Maintaini	ERT W. WOODRUE				0633971 Page 2
3	Using the organization's acquisition					
•	collection items (check all that app			it any or the ren	ownig that make eigh	micanic doc or ito
а	X Public exhibition	-77-	d X Loan	or exchange prog	ram	
b	X Scholarly research		e Other			
С	X Preservation for future gene	rations				
4	Provide a description of the organ		and explain how	they further the	organization's exemp	t purpose in Part
	XIII.		·	•		
5	During the year, did the organization	on solicit or receive d	onations of art, hist	orical treasures,	or other similar	
	assets to be sold to raise funds rath	ner than to be mainta	ined as part of the	organization's co	lection?	Yes X No
	rt IV Escrow and Custodial A Complete if the organiza 990, Part X, line 21.	ation answered "Ye			·	nt on Form
1 a	Is the organization an agent, trus					
	included on Form 990, Part X?					Yes No
b	If "Yes," explain the arrangement i	n Part XIII and comp	lete the following tal	ble:		
					Amount	
	Beginning balance					
	Additions during the year					
_	Distributions during the year					
f 2-	Ending balance				ial aggrupt lightlitus	Yes No
	Did the organization include an am					
	If "Yes," explain the arrangement in the arrangemen	II Part Alli. Check ne	ere ii trie explanation	rias been provide	o on Part Alli	
Га	rt V Endowment Funds. Complete if the organiza	ation answered "Ye	s" on Form 990 F	Part IV line 10		
	Complete ii tile erganize	(a) Current year	(b) Prior year	(c) Two years back	(d) Three years back	(e) Four years back
4.	Designing of year belongs	315,888,139.	368,587,906.	338,497,595.	358,951,159.	380,631,061.
	Beginning of year balance Contributions	12,284,269.	8,905,713.	1,795,580.	3,135,337.	5,916,534.
		12/201/2031	0,503,113.	177373001	371337337.	3,710,7331.
C	Net investment earnings, gains, and losses	1,025,885.	-45,312,746.	86,476,265.	5,437,073.	-10,839,100.
٨	Grants or scholarships					
	Other expenditures for facilities					
C	and programs	14,021,602.	16,292,734.	58,181,534.	29,025,974.	16,757,336.
f	Administrative expenses					
	End of year balance	315,176,691.	315,888,139.	368,587,906.	338,497,595.	358,951,159.
2 a	Provide the estimated percentage Board designated or quasi-endown			, column (a)) held	as:	
b	Permanent endowment79.01	00 %				
С	Term endowment8.1100 %					
	The percentages on lines 2a, 2b, a	and 2c should equal 1	00%.			
3a	Are there endowment funds not in	the possession of th	e organization that	are held and adı	ministered for the	
	organization by:					Yes No
	(i) Unrelated organizations					3a(i) X
	(ii) Related organizations					3a(ii) X
b	If "Yes" on line 3a(ii), are the relate	•	•			3b X
4	Describe in Part XIII the intended u		tion's endowment fu	nds.		
Pa	rt VI Land, Buildings, and Equ Complete if the organize	นเpment. ation answered "Ye	es" on Form 990.	Part IV. line 11a	a. See Form 990. Pa	art X. line 10.
	5	1				

	Complete if the organization answered the on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.						
	Description of property	(a) Cost or other basis (investment)	(b) Cost or other basis (other)	(c) Accumulated depreciation	(d) Book value		
1a Land			10,526,166.		10,526,166.		
b Buildir	ngs		264,808,815.	127,471,450.	137,337,365.		
	hold improvements						
d Equipi	ment		84,798,489.	75,306,581.	9,491,908.		
			1,364,216.	1,249,644.	114,572.		
Total. Add I	Total. Add lines 1a through 1e. (Column (d) must equal Form 990, Part X, column (B), line 10c.).						

Part VII	Investments - Other Securities. Complete if the organization answered	l "Yes" on Form 990	Part IV line 11b See Form 990	Part X line 12
	(a) Description of security or category (including name of security)	(b) Book value	(c) Method of valuat Cost or end-of-year mark	ion:
(1) Financia	al derivatives			
. ,	held equity interests			
(3) Other _	. ,			
	E FUNDS	59,249,911.	FMV	
(B) PRIV	ATE EQUITY FUNDS	43,166,554.	FMV	
(C)DIST	RESSED OPPORTUNITY FUNDS	NONE	FMV	
(D) EMER	RGING MARKETS	NONE	FMV	
(E) SENI	OR DIRECT LOAN FUNDS	46,843.	FMV	
(F) REAI	_ ESTATE FUNDS	6,379,139.	FMV	
(G)				
(H)				
	(b) must equal Form 990, Part X, col. (B) line 12.)	108,842,447.		
Part VIII	Investments - Program Related. Complete if the organization answered	l "Yes" on Form 990	, Part IV, line 11c. See Form 990	, Part X, line 13.
	(a) Description of investment	(b) Book value	(c) Method of valuat Cost or end-of-year mark	
<u>(1)</u>				
(2)				
(3)				
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
	(b) must equal Form 990, Part X, col. (B) line 13.)			
Part IX	Other Assets. Complete if the organization answered	"Yes" on Form 990	, Part IV, line 11d. See Form 990	, Part X, line 15.
	(a) De:	scription		(b) Book value
(1)				
(2)				
(3)				
(4)				
(5)				
(6)				
(7)				
(8)				
(9)				
	ımn (b) must equal Form 990, Part X, col. (B) lı	ine 15.)		
Part X	Other Liabilities.			
	Complete if the organization answered line 25.	l "Yes" on Form 990	l, Part IV, line 11e or 11f. See For	m 990, Part X,
1.		tion of liability		(b) Book value
	al income taxes			
(2)				
(3)				
(4)				
(5)				
(6)				
(7)				
(8)				

Total. (Column (b) must equal Form 990, Part X, col. (B) line 25.) 2. Liability for uncertain tax positions. In Part XIII, provide the text of the footnote to the organization's financial statements that reports the organization's liability for uncertain tax positions under FASB ASC 740. Check here if the text of the footnote has been provided in Part XIII .

Schedule D (Form 990) 2022

Part 2	Reconciliation of Revenue per Audited Financial Statements With Revenue per Return Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.	n.
1	Total revenue, gains, and other support per audited financial statements	1
	Amounts included on line 1 but not on Form 990, Part VIII, line 12:	
	Net unrealized gains (losses) on investments	
	Donated services and use of facilities	
	Recoveries of prior year grants	-
	Other (Describe in Part XIII.)	-
	Add lines 2a through 2d	2e
_	Subtract line 2e from line 1	3
3	Amounts included on Form 990, Part VIII, line 12, but not on line 1:	
	Investment expenses not included on Form 990, Part VIII, line 7b	
		-
	Other (Describe in Part XIII.)	4c
с 5	Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.)	5
Part 2		
T art z	Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.	AI 11.
1	Total expenses and losses per audited financial statements	1
2	Amounts included on line 1 but not on Form 990, Part IX, line 25:	
а	Donated services and use of facilities	
b	Prior year adjustments	
	Other losses	
	Other (Describe in Part XIII.)	
	Add lines 2a through 2d	2e
	Subtract line 2e from line 1	3
	Amounts included on Form 990, Part IX, line 25, but not on line 1:	
	Investment expenses not included on Form 990, Part VIII, line 7b	
b	Other (Describe in Part XIII.)	
С	Add lines 4a and 4b	4c
	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.)	5
	XIII Supplemental Information.	
Provide 2; Part	e the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; FXI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional inform	Part V, line 4; Part X, line nation.
SEE S	SUPPLEMENTAL PAGE	

SCHEDULE D, PART III, LINE 1A

THE HIGH MUSEUM OF ART'S COLLECTIONS COMPRISE MORE THAN 19,100 OBJECTS

AND WORKS OF ART. THE COLLECTIONS ARE MAINTAINED FOR PUBLIC EXHIBITION,

EDUCATION AND RESEARCH IN FURTHERANCE OF PUBLIC SERVICE RATHER THAN FOR

FINANCIAL GAIN AND ARE CONSIDERED TO HAVE CULTURAL, AESTHETIC OR

HISTORICAL VALUE WORTH PRESERVING PERPETUALLY. IN CONFORMITY WITH

ACCOUNTING PRACTICES GENERALLY FOLLOWED BY ART MUSEUMS, THE VALUE OF THE

MUSEUM'S COLLECTIONS HAS BEEN EXCLUDED FROM THE CONSOLIDATED STATEMENTS

OF FINANCIAL POSITION. CONTRIBUTIONS FOR PURCHASES OF ART OBJECTS ARE

RECORDED AS INCREASES IN NET ASSETS AND PURCHASES OF ART OBJECTS ARE

RECORDED AS DECREASES IN NET ASSETS IN THE CONSOLIDATED STATEMENTS OF

ACTIVITIES.

PROCEEDS RECEIVED FROM THE DEACCESSION OF WORKS OF ART ARE USED TO

PURCHASE OTHER WORKS OF ART OR FOR DIRECT CARE OF THE MUSEUM'S

COLLECTIONS. DIRECT CARE IS DEFINED AS COSTS ASSOCIATED WITH

CONSERVATION, PRESERVATION, REGISTRATION, MAINTENANCE, STORAGE AND

SAFEGUARDING OF COLLECTIONS. THERE WERE NO PROCEEDS FROM DEACCESSIONS OF

ART FOR THE YEARS ENDED MAY 31, 2023 AND MAY 31, 2022.

SCHEDULE D, PART III, LINE 4

THE HIGH MUSEUM OF ART HAS MORE THAN 19,100 OBJECTS AND WORKS OF ART IN ITS PERMANENT COLLECTION, AN EXTENSIVE ANTHOLOGY OF 19TH AND 20TH CENTURY AMERICAN AND DECORATIVE ART, SIGNIFICANT HOLDINGS OF EUROPEAN PAINTINGS, A GROWING COLLECTION OF AFRICAN-AMERICAN ART, AND A BURGEONING COLLECTION OF MODERN, CONTEMPORARY, AND AFRICAN ART. THE HIGH IS DEDICATED TO SUPPORTING AND COLLECTING WORKS BY SOUTHERN ARTISTS, AND IS DISTINGUISHED AS THE ONLY MAJOR MUSEUM IN NORTH AMERICA TO HAVE A CURATORIAL DEPARTMENT SPECIFICALLY DEVOTED TO THE FIELD OF FOLK AND SELF-TAUGHT ART.

SCHEDULE D, PART V, LINE 4

ENDOWMENT FUNDS ARE AVAILABLE FOR USE IN OPERATIONAL SUPPORT AND ORGANIZATIONAL GROWTH.

SCHEDULE D, PART X, LINE 2

THE ARTS CENTER IS RECOGNIZED AS AN ORGANIZATION EXEMPT FROM FEDERAL INCOME TAXES UNDER SECTION 501(A) OF THE INTERNAL REVENUE CODE AS AN ORGANIZATION DESCRIBED IN SECTION 501(C)(3) WHEREBY ONLY UNRELATED BUSINESS INCOME, IS SUBJECT TO FEDERAL INCOME TAX.

THE ARTS CENTER ACCOUNTS FOR INCOME TAXES IN ACCORDANCE WITH GAAP. THIS

PRESCRIBES THE USE OF THE LIABILITY METHOD WHEREBY DEFERRED TAX ASSET AND

LIABILITY ACCOUNT BALANCES ARE DETERMINED BASED ON DIFFERENCES BETWEEN

THE FINANCIAL REPORTING AND TAX BASES OF ASSETS AND LIABILITIES AND ARE

MEASURED USING THE ENACTED RATES AND LAWS THAT WILL BE IN EFFECT WHEN THE DIFFERENCES ARE EXPECTED TO REVERSE. THE ARTS CENTER PROVIDES A VALUATION ALLOWANCE, IF NECESSARY, TO REDUCE DEFERRED TAX ASSETS TO THEIR ESTIMATED REALIZABLE VALUE.

THE ARTS CENTER ACCOUNTS FOR UNCERTAINTY IN INCOME TAXES BY PRESCRIBING
THE MINIMUM RECOGNITION THRESHOLD A TAX POSITION IS REQUIRED TO MEET
BEFORE BEING RECOGNIZED IN THE FINANCIAL STATEMENTS. THE ARTS CENTER
UTILIZES A TWO-STEP APPROACH FOR EVALUATING TAX POSITIONS. RECOGNITION
OCCURS WHEN THE ARTS CENTER CONCLUDES THAT A TAX POSITION, BASED SOLELY
ON ITS TECHNICAL MERITS, IS MORE LIKELY THAN NOT TO BE SUSTAINED UPON
EXAMINATION. MEASUREMENT IS ONLY ADDRESSED IF RECOGNITION HAS BEEN
SATISFIED. UNDER MEASUREMENT, THE TAX BENEFIT IS MEASURED AT THE LARGEST
AMOUNT OF BENEFIT, DETERMINED ON A CUMULATIVE PROBABILITY BASIS THAT IS
MORE LIKELY THAN NOT TO BE REALIZED UPON FINAL SETTLEMENT. THE TERM "MORE
LIKELY THAN NOT" IS INTERPRETED TO MEAN THAT THE LIKELIHOOD OF OCCURRENCE
IS GREATER THAN 50%.

ASC 740, ACCOUNTING FOR UNCERTAINTY IN INCOME TAXES, ESTABLISHES THE CRITERION THAT AN INDIVIDUAL TAX POSITION HAS TO MEET FOR SOME OR ALL OF THE BENEFITS OF THAT POSITION TO BE RECOGNIZED IN THE ARTS CENTER'S CONSOLIDATED FINANCIAL STATEMENTS. UNDER ASC 740, THE ARTS CENTER IS REQUIRED TO DETERMINE THAT THE RELEVANT TAX AUTHORITY WOULD MORE LIKELY THAN NOT SUSTAIN ITS TAX POSITION FOLLOWING AN IRS AUDIT. TAX YEARS OPEN TO EXAMINATION BY TAX AUTHORITIES UNDER THE STATUTE OF LIMITATIONS INCLUDE FISCAL 2020 THROUGH 2023. THE ARTS CENTER HAS DETERMINED THAT ITS MATERIAL TAX POSITIONS SATISFY THE MORE LIKELY THAN NOT CRITERION AND

THAT NO PROVISION FOR INCOME TAXES WAS REQUIRED AT MAY 31, 2023 AND 2022, FOR UNCERTAIN TAX POSITIONS.

DEFERRED INCOME TAXES ARE PROVIDED FOR DIFFERENCES IN TIMING OF INCOME AND EXPENSES FOR FINANCIAL REPORTING AND INCOME TAX REPORTING PURPOSES.

DURING THE YEARS ENDED MAY 31, 2023 AND 2022, THE ARTS CENTER RECORDED A DEFERRED INCOME TAX ASSET RELATING TO TRANSFERABLE GEORGIA FILM PRODUCTION TAX CREDITS IN THE AMOUNT OF \$3,198,128 AND \$1,656,268, RESPECTIVELY, OF WHICH, \$1,541,860 AND \$1,656,268 WAS ALSO RECORDED AS A CREDIT FOR DEFERRED INCOME TAXES DURING THE YEARS ENDED MAY 31, 2023 AND 2022, RESPECTIVELY.

UNDER THE GEORGIA'S ENTERTAINMENT INDUSTRY INVESTMENT ACT, COMPANIES THAT PRODUCE FILM, TELEVISION SERIES, MUSIC VIDEOS AND COMMERCIALS CAN BE PROVIDED A 20 PERCENT TAX CREDIT ON PRODUCTION AND POST-PRODUCTION COSTS IN GEORGIA. THE ACT ALSO PROVIDES AN ADDITIONAL 10 PERCENT TAX CREDIT IF THE FINISHED PROJECT INCLUDES A PROMOTIONAL LOGO PROVIDED BY THE STATE. THE ARTS CENTER IS ELIGIBLE FOR 30% TAX CREDIT ON PRODUCTION AND POST-PRODUCTION COSTS RELATED TO VIRTUAL PERFORMANCES CONDUCTED AT ATLANTA SYMPHONY ORCHESTRA AND ALLIANCE THEATRE THAT OCCURRED DURING FISCAL YEARS 2023 AND 2022. THE ARTS CENTER CALCULATED GEORGIA TAX CREDITS IN THE AMOUNT OF \$1,713,178 AND \$1,840,298 RESPECTIVELY FOR FISCAL YEARS 2023 AND 2022. AS THE ARTS CENTER IS NOT ABLE TO UTILIZE THE CREDITS AGAINST ITS OWN TAXABLE REVENUE, IT INTENDS TO SELL THE CREDITS ONCE FORMAL APPROVAL IS PROVIDED BY THE GEORGIA DEPARTMENT OF REVENUE. THE ARTS CENTER ESTIMATES THEY CAN SELL THE CREDITS FOR APPROXIMATELY 90% OF CREDIT AMOUNT, THUS HAS RECORDED A VALUATION ALLOWANCE ON THE DEFERRED

Page **5**

Supplemental Information (continued) Part XIII

TAX CREDITS IN THE AMOUNT OF \$171,318 AS OF MAY 31, 2023, AND \$184,030 AS OF MAY 31, 2022.

SCHEDULE F (Form 990)

Statement of Activities Outside the United States

Complete if the organization answered "Yes" on Form 990, Part IV, line 14b, 15, or 16.

Attach to Form 990.

2022

OMB No. 1545-0047

Open to Public Inspection

Department of the Treasury Internal Revenue Service Name of the organization

Go to www.irs.gov/Form990 for instructions and the latest information.

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Fart I General Information on Activities Outside the United States. Complete if the organization answered "Yes" on

	Form 990, Part IV, line 14	b.				
	For grantmakers. Does the orgother assistance, the grantees' award the grants or assistance?	eligibility for t	he grants or		_	Yes No
	For grantmakers. Describe in loutside the United States.	Part V the org	anization's pro	ocedures for monitoring t	he use of its grants and	d other assistance
3	Activities per Region. (The follow	ving Part I, line	3 table can be	e duplicated if additional sp	ace is needed.)	
	(a) Region	(b) Number of offices in the region	(c) Number of employees, agents, and independent contractors in the region	(d) Activities conducted in the region (by type) (such as, fundraising, program services, investments, grants to recipients located in the region)	(e) If activity listed in (d) is a program service, describe specific type of service(s) in the region	(f) Total expenditures for and investments in the region
(1)	CENTRAL AMERICA/CARIBBEAN	NONE	NONE	INVESTMENTS		205,215,895.
(2)	NORTH AMERICA	NONE	NONE	PROGRAM SERVICES	SCOUTING	480.
(3)	EUROPE	NONE	NONE	PROGRAM SERVICES	SCOUTING	28,181.
(4)						
(5)						
(6)						
(7)						
(8)						
(9)						
(10)						
(11)						
(12)						
(13)						
(14)						
(15)						
(16)						
(17)						
3a	Subtotal	NONE	NONE			205,244,556.
b	Total from continuation sheets to Part I					
С	Totals (add lines 3a and 3b)	NONE	NONE			205,244,556.

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule F (Form 990) 2022

Schedule F ((Form 990) 2022 ROB	ERT W. WOODRUFF	ARTS CENTER, INC	•	58-063	3971			Page 2			
Part II	Grants and Other Assistance to Organizations or Entities Outside the United States. Complete if the organization answered "Yes" on Form 990 Part IV, line 15, for any recipient who received more than \$5,000. Part II can be duplicated if additional space is needed.											
	Part IV, line 15, for any r	ecipient who receive	ed more than \$5,000. I	needed.								
1	(a) Name of organization	(b) IRS code section and EIN (if applicable)	(c) Region	(d) Purpose of grant	(e) Amount of cash grant	(f) Manner of cash disbursement	(g) Amount of noncash assistance	(h) Description of noncash assistance	(i) Method of valuation (book, FMV, appraisal, other			
(1)												
(2)												
(3)												
(4)												
(5)												
(6)												
(7)												
(8)												
(9)												
(10)												
(11)												
(12)												
(13)												
(14)												
(15)												
(16)												
exe	er total number of recipient or mpt 501(c)(3) organization by t er total number of other organi	he IRS, or for which the	e grantee or counsel has	provided a sec	tion 501(c)(3) equi	valency letter	>					

Part III Grants and Other Assistance to Individuals Outside the United States. Complete if the organization answered "Yes" on Form 990, Part IV, line 16. Part III can be duplicated if additional space is needed.

(a) Type of grant or assistance	(b) Region	(c) Number of recipients	(d) Amount of cash grant	(e) Manner of cash disbursement	(f) Amount of noncash assistance	(g) Description of noncash assistance	(h) Method of valuation (book, FMV, appraisal, other)
_(1)							
(2)							
(3)							
(4)							
(5)							
(6)							
(8)							
(9)							
(10)							
(11)							
(12)							
(13)							
(14)							
(15)							
(16)							
(17)							
<u>(</u> 18)							

1	Was the organization a U.S. transferor of property to a foreign corporation during the tax year? If "Yes," the organization may be required to file Form 926, Return by a U.S. Transferor of Property to a Foreign Corporation (see Instructions for Form 926)	X	Yes		No
2	Did the organization have an interest in a foreign trust during the tax year? If "Yes," the organization may be required to separately file Form 3520, Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts, and/or Form 3520-A, Annual Information Return of Foreign Trust With a U.S. Owner (see Instructions for Forms 3520 and 3520-A; don't file with Form 990)		Yes	X	No
3	Did the organization have an ownership interest in a foreign corporation during the tax year? If "Yes," the organization may be required to file Form 5471, Information Return of U.S. Persons With Respect to Certain Foreign Corporations (see Instructions for Form 5471)		Yes	X	No
4	Was the organization a direct or indirect shareholder of a passive foreign investment company or a qualified electing fund during the tax year? If "Yes," the organization may be required to file Form 8621, Information Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund (see Instructions for Form 8621)	X	Yes		No
5	Did the organization have an ownership interest in a foreign partnership during the tax year? If "Yes," the organization may be required to file Form 8865, Return of U.S. Persons With Respect to Certain Foreign Partnerships (see Instructions for Form 8865)	X	Yes		No
6	Did the organization have any operations in or related to any boycotting countries during the tax year? If "Yes," the organization may be required to separately file Form 5713, International Boycott Report (see Instructions for Form 5713; don't file with Form 990)		Yes	X	No

SCHEDULE G (Form 990)

Supplemental Information Regarding Fundraising or Gaming Activities

Complete if the organization answered "Yes" on Form 990, Part IV, line 17, 18, or 19, or if the organization entered more than \$15,000 on Form 990-EZ, line 6a.

Attach to Form 990 or Form 990-EZ.

OMB No. 1545-0047

2022

Open to Public

Department of the Treasury Go to www.irs.gov/Form990 for instructions and the latest information. Inspection Internal Revenue Service Employer identification number ROBERT W. WOODRUFF ARTS CENTER, INC. Fundraising Activities. Complete if the organization answered "Yes" on Form 990, Part IV, line 17. Form 990-EZ filers are not required to complete this part. Indicate whether the organization raised funds through any of the following activities. Check all that apply. 1 Mail solicitations Solicitation of non-government grants а Internet and email solicitations f Solicitation of government grants Phone solicitations Special fundraising events C g In-person solicitations d Did the organization have a written or oral agreement with any individual (including officers, directors, trustees, or key employees listed in Form 990, Part VII) or entity in connection with professional fundraising services? Yes b If "Yes," list the 10 highest paid individuals or entities (fundraisers) pursuant to agreements under which the fundraiser is to be compensated at least \$5,000 by the organization. (v) Amount paid to (iii) Did fundraiser have (vi) Amount paid to (i) Name and address of individual (iv) Gross receipts (or retained by) custody or control of (or retained by) (ii) Activity or entity (fundraiser) from activity fundraiser listed in organization contributions? col. (i) Yes No 1 2 3 6 7 8 9 10 Total List all states in which the organization is registered or licensed to solicit contributions or has been notified it is exempt from registration or licensing. AL, AK, AR, CA, CO, CT, DC, FL, GA, HI, IL, KS, KY, LA, MD, MA, MI, MN, MS, MO, NV, NH, NJ, NM, NY, NC, ND, OH, OK, OR, PA, RI, SC, TN, UT, VA, WA, WV, WI,

Revenue		(a) Bingo	bingo/progressive bingo	(c) Other gaming	col. (a) through col. (c)
Rev	1 Gross revenue				
ses	2 Cash prizes				
xpen	3 Noncash prizes				
Direct Expenses	4 Rent/facility costs				
	5 Other direct expenses				
	6 Volunteer labor	Yes % No	Yes% No	Yes% No	
	7 Direct expense summary. Add lir	nes 2 through 5 in colu	umn (d)		
	8 Net gaming income summary. So	ubtract line 7 from line	e 1, column (d)		
9 a k	If "NI a " averlain.		in each of these state		Yes No
10 a	. If \(\sigma = = \cdot = \cdot	g licenses revoked, susp		uring the tax year?	Yes No

Sched	ule G (Form 990 or 990-EZ) 2022 ROBERT W. WOODRUFF ARTS CENTER, INC. 58-0633971 Page 3
11	Does the organization conduct gaming activities with nonmembers?
12	Is the organization a grantor, beneficiary or trustee of a trust or a member of a partnership or other entity
	formed to administer charitable gaming?
13	Indicate the percentage of gaming activity conducted in:
а	The organization's facility
b	An outside facility
14	Enter the name and address of the person who prepares the organization's gaming/special events books and
	records:
	Name ►
	Address
	Address ▶
15 2	Does the organization have a contract with a third party from whom the organization receives gaming
ısa	revenue?
b	If "Yes," enter the amount of gaming revenue received by the organization ▶ \$ and the
-	amount of gaming revenue retained by the third party ▶ \$
С	If "Yes," enter name and address of the third party:
	Name ▶
	Address ►
16	Gaming manager information:
	Nama N
	Name ▶
	Gaming manager compensation ▶\$
	Description of services provided ▶
	Director/officer Employee Independent contractor
17	Mandatory distributions:
а	Is the organization required under state law to make charitable distributions from the gaming proceeds to
L	retain the state gaming license? Yes No Enter the amount of distributions required under state law to be distributed to other exempt organizations
b	or spent in the organization's own exempt activities during the tax year > \$
Par	
ıaı	Part III, lines 9, 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional information
	(see instructions).

SCHEDULE J (Form 990)

Compensation Information

For certain Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees

Complete if the organization answered "Yes" on Form 990, Part IV, line 23.

Attach to Form 990.

2022
Open to Public Inspection

OMB No. 1545-0047

Department of the Treasury Internal Revenue Service Name of the organization

Go to www.irs.gov/Form990 for instructions and the latest information.

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number 58-0633971

Questions Regarding Compensation Part I Yes No 1a Check the appropriate box(es) if the organization provided any of the following to or for a person listed on Form 990, Part VII, Section A, line 1a. Complete Part III to provide any relevant information regarding these items. First-class or charter travel Housing allowance or residence for personal use Travel for companions Payments for business use of personal residence Tax indemnification and gross-up payments Χ Health or social club dues or initiation fees Х Discretionary spending account Personal services (such as maid, chauffeur, chef) b If any of the boxes on line 1a are checked, did the organization follow a written policy regarding payment or reimbursement or provision of all of the expenses described above? If "No," complete Part III to 1b Did the organization require substantiation prior to reimbursing or allowing expenses incurred by all directors, trustees, and officers, including the CEO/Executive Director, regarding the items checked on line Х 2 Indicate which, if any, of the following the organization used to establish the compensation of the organization's CEO/Executive Director. Check all that apply. Do not check any boxes for methods used by a related organization to establish compensation of the CEO/Executive Director, but explain in Part III. Compensation committee X Written employment contract Χ Χ Independent compensation consultant Compensation survey or study Form 990 of other organizations | X | Approval by the board or compensation committee During the year, did any person listed on Form 990, Part VII, Section A, line 1a, with respect to the filing organization or a related organization: Χ 4a **b** Participate in or receive payment from a supplemental nongualified retirement plan? 4b Х Participate in or receive payment from an equity-based compensation arrangement? Χ If "Yes" to any of lines 4a-c, list the persons and provide the applicable amounts for each item in Part III. Only section 501(c)(3), 501(c)(4), and 501(c)(29) organizations must complete lines 5-9. For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the revenues of: 5a Χ 5b Χ If "Yes" on line 5a or 5b, describe in Part III. For persons listed on Form 990, Part VII, Section A, line 1a, did the organization pay or accrue any compensation contingent on the net earnings of: Χ 6b Χ If "Yes" on line 6a or 6b, describe in Part III. For persons listed on Form 990, Part VII, Section A, line 1a, did the organization provide any nonfixed payments not described on lines 5 and 6? If "Yes," describe in Part III 7 Х Were any amounts reported on Form 990, Part VII, paid or accrued pursuant to a contract that was subject to the initial contract exception described in Regulations section 53.4958-4(a)(3)? If "Yes," describe

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule J (Form 990) 2022

8

Part II Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees. Use duplicate copies if additional space is needed.

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that aren't listed on Form 990, Part VII.

Note: The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

		(B) Breakdown of W-2 a	nd/or 1099-MISC and/or 1	099-NEC compensation	(C) Retirement and	(D) Nontaxable	(E) Total of columns	(F) Compensation	
(A) Name and Title		(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation	other deferred compensation	benefits	(B)(i)-(D)	in column (B) reported as deferred on prior Form 990	
RAND SUFFOLK	(i)	548,453.	75,581.	NONE	37,083.	30,177.	691,294.	NONE	
1 HIGH MUSEUM DIRECTOR	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
HALA MODDELMOG	(i)	411,889.	100,000.	NONE	3,877.	759.	516,525.	NONE	
2 PRESIDENT	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
SUSAN BOOTH	(i)	429,073.	30,000.	NONE	12,200.	20,490.	491,763.	NONE	
3 ARISTIC DIRECTOR - AT	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
JENNIFER BARLAMENT	(i)	325,646.	78,036.	NONE	37,200.	25,503.	466,385.	NONE	
4 EXECUTIVE DIRECTOR - ASO	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
MICHAEL SCHLEIFER	(i)	289,637.	35,000.	NONE	11,230.	30,098.	365,965.	NONE	
5 INTERIM EXECUTVIE DIRECTOR	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
SUSAN AMBO	(i)	256,963.	60,000.	NONE	11,356.	118.	328,437.	NONE	
6 CFO ASO	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
BRADY LUM	(i)	263,044.	35,000.	NONE	12,200.	30,177.	340,421.	NONE	
7 DEPUTY DIRECTOR	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
KRISTIN HANSEN	(i)	242,531.	30,000.	NONE	10,920.	1,025.	284,476.	NONE	
8 CHIEF DEVELOPMENT OFFICER	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
DAVID COUCHERON	(i)	255,328.	2,500.	NONE	NONE	11,590.	269,418.	NONE	
9 CONCERTMASTER	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
ELEANOR TARVIN	(i)	229,558.	20,000.	NONE	10,095.	8,653.	268,306.	NONE	
10 CHIEF HUMAN RESOURCES OFFICER	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
BETH GIBBS	(i)	215,886.	20,000.	NONE	6,028.	1,025.	242,939.	NONE	
11 GENERAL COUNSEL	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
BRIAN WALLEY	(i)	199,080.	15,000.	NONE	8,938.	18,389.	241,407.	NONE	
12 CFO (EFFECTIVE 06/01/2022)	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
ROBERT SPANO	(i)	210,694.	NONE	NONE	8,671.	11,250.	230,615.	NONE	
13 MUSIC DIRECTOR	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
KAMA PIERCE	(i)	183,048.	15,000.	NONE	7,897.	NONE	205,945.	NONE	
14 SR VP OF STRATEGY	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
BRIAN SHIVELY	(i)	177,047.	10,539.	NONE	4,357.	2,500.	194,443.	NONE	
15 DIRECTOR OF FINANCE & ADMIN	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	
NICOLE PANUNTI	(i)	162,556.	25,000.	NONE	3,767.	1,025.	192,348.	NONE	
16 VP OF ATLANTA SYMPHONY HALL	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE	

Schedule J (Form 990) 2022

Part II Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees. Use duplicate copies if additional space is needed.

For each individual whose compensation must be reported on Schedule J, report compensation from the organization on row (i) and from related organizations, described in the instructions, on row (ii). Do not list any individuals that aren't listed on Form 990, Part VII.

Note: The sum of columns (B)(i)-(iii) for each listed individual must equal the total amount of Form 990, Part VII, Section A, line 1a, applicable column (D) and (E) amounts for that individual.

		(B) Breakdown of W-2 a	nd/or 1099-MISC and/or	1099-NEC compensation	(C) Retirement and	(D) Nontaxable	(E) Total of columns	(F) Compensation
(A) Name and Title		(i) Base compensation	(ii) Bonus & incentive compensation	(iii) Other reportable compensation	other deferred compensation	benefits	(B)(i)-(D)	in column (B) reported as deferred on prior Form 990
KEVIN TUCKER	(i)	171,856.	15,600.	NONE	7,633.	8,432.	203,521.	NONE
1 CHIEF CURATOR	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE
GRACE SIPUSIC	(i)	162,455.	25,000.	NONE	7,607.	9,639.	204,701.	NONE
2 VP OF DEVELOPMENT ASO	(ii)	NONE	NONE	NONE	NONE	NONE	NONE	NONE
	(i)							
3	(ii)							
	(i)							
4	(ii)							
	(i)							
5	(ii)							
	(i)							
6	(ii)							
	(i)							
7	(ii)							
	(i)							
8	(ii)							
	(i)							
9	(ii)							
	(i)							
10	(ii)							
	(i)							
	(ii)							
	(i)							
12	(ii)							
	(i)							
13	(ii)							
44	(i) (ii)							
14								
45	(i) (ii)							
15								
40	(i) (ii)							
16	(II)							

Part | Supplemental Information

Provide the information, explanation, or descriptions required for Part I, lines 1a, 1b, 3, 4a, 4b, 4c, 5a, 5b, 6a, 6b, 7, and 8, and for Part II. Also complete this part for any additional information.

SCHEDULE J, PART I, LINE 4A

INDIVIDUALS WHO SERVED AS OFFICERS FOR PART OF THE YEAR RECEIVED

SEVERANCE PAYMENTS AFTER THEIR EMPLOYMENT ENDED.

SCHEDULE J, PART I, LINE 4B

THE ARTS CENTER MAINTAINS A NONQUALIFIED PLAN FOR CERTAIN CURRENT AND FORMER MANAGEMENT PERSONNEL. THE TOTAL EXPENSE FOR CURRENT EMPLOYEES IS \$49,883.

SCHEDULE J, PART I, LINE 7

OFFICERS AND OTHER MANAGEMENT PERSONNEL ARE ELIGIBLE TO PARTICIPATE IN BONUSES.

SCHEDULE K (Form 990)

Supplemental Information on Tax-Exempt Bonds

Complete if the organization answered "Yes" on Form 990, Part IV, line 24a. Provide descriptions, explanations, and any additional information in Part VI.

Attach to Form 990.

Department of the Treasury Internal Revenue Service

Bond Issues

Part I

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2022
Open to Public Inspection

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number
58-0633971

(a) Issuer name	(b) Issuer EIN	(c) CUSIP#	(d) Date issue	ed (e) Is	sue price	(f) Description of purpose			(g) De	feased	(h) (beha issu	lf of	(i) Poole financin
									Yes	No	Yes	No	Yes N
A DEVELOPMENT AUTHORITIES OF FULTON AND DEKALB	58-1639487		09/24/200	9 196	,035,351.	REFUND 2/1/0	2, 4/28/04,	1/16/08		Х		Х	Х
													.
B DEVELOPMENT AUTHORITIES OF FULTON CO.	58-1639487		12/30/201	5 43	,710,329.	REFUND 9/24/	2009			Х		х	
C DEVELOPMENT AUTHORITIES OF FULTON CO.	58-1639487		01/10/201	0 66	22/ 175	REFUND A POR	TION OF 9/2	4/2009		x		x	x
DEVELOPMENT AUTHORITIES OF FULION CO.	50-1039407		01/10/201	9 55	,334,1/3.	REFUND A POR	110N OF 9/2	4/2009		Δ.		^	
D													
Part II Proceeds	I												
					Α		В	(C			D	
1 Amount of bonds retired				146,	455,351	1.							
2 Amount of bonds legally defeased													
3 Total proceeds of issue				196,	035,351	1. 43,	710,329.	55,3	334,1	75.			
4 Gross proceeds in reserve funds													
5 Capitalized interest from proceeds													
6 Proceeds in refunding escrows													
7 Issuance costs from proceeds				2,	040,700	0.	519,194.	!	539,6	12.			
8 Credit enhancement from proceeds					271,65	1.							
9 Working capital expenditures from proceeds													
10 Capital expenditures from proceeds													
11 Other spent proceeds				188,	631,750	43,	191,135.	54,5	794,56	53.			
12 Other unspent proceeds													
13 Year of substantial completion					_								
				Yes	No	Yes	No	Yes	No		Yes	\perp	No
14 Were the bonds issued as part of a refu	•	•	, ,										
if issued prior to 2018, a current refunding iss				X		X		X					
15 Were the bonds issued as part of a refu	-		-										
issued prior to 2018, an advance refunding iss					X		Х		X			\perp	
16 Has the final allocation of proceeds been made				X		X		X				\perp	
17 Does the organization maintain adequate													
final allocation of proceeds?				X		X		X					

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule K (Form 990) 2022

Pa	rt III Private Business Use	ROBERT W.	WOODRIJF	F ARTS	CENTER				raye Z
. «			A		В		С)
1	Was the organization a partner in a partnership, or a member of an LLC,	Yes	No	Yes	No	Yes	No	Yes	No
	which owned property financed by tax-exempt bonds?		Х		Х		Х		
2	Are there any lease arrangements that may result in private business use								
	bond-financed property?		Х		X		X		
3a	a Are there any management or service contracts that may result in priva								
	business use of bond-financed property?		X		X		Х		
b	If "Yes" to line 3a, does the organization routinely engage bond counsel or other outsi								
	counsel to review any management or service contracts relating to the financed property?								
С	Are there any research agreements that may result in private business use								
	bond-financed property?		X		X		Х		
d	f I If "Yes" to line 3c, does the organization routinely engage bond counsel or other.								
	outside counsel to review any research agreements relating to the financed property?								
4	Enter the percentage of financed property used in a private business use by entiti								
	other than a section 501(c)(3) organization or a state or local government		%		%		%		%
5	Enter the percentage of financed property used in a private business use as								
	result of unrelated trade or business activity carried on by your organization				2222 0/	_	2222		0/
	another section 501(c)(3) organization, or a state or local government		2.0300 %		.0300 %		.0300 %		<u>%</u>
6	Total of lines 4 and 5		2.0300 %	2	.0300 %	2	.0300 %		%
7	Does the bond issue meet the private security or payment test?		X		X		X		
8a	Has there been a sale or disposition of any of the bond-financed property to a								
	nongovernmental person other than a 501(c)(3) organization since the bonds were issued	ed? X		X		X			
b	o If "Yes" to line 8a, enter the percentage of bond-financed property sold or				0.		0/		0/
	disposed of	· · ``	7.8644 %		%		%		<u>%</u>
С	If "Yes" to line 8a, was any remedial action taken pursuant to Regulations								
	sections 1.141-12 and 1.145-2?	X			X		X		
9	rias and organization detailments in their production to entitle and an								
	nonqualified bonds of the issue are remediated in accordance with the requirements under Regulations sections 1.141-12 and 1.145-2?								
D-	· · · · · · · · · · · · · · · · · · ·	X		X		X			
Pa	rt IV Arbitrage		Α		В		С		
1	Has the issuer filed Form 8038-T, Arbitrage Rebate, Yield Reduction a	nd Yes	No	Yes	No	Yes	No	Yes	No No
'	Penalty in Lieu of Arbitrage Rebate?		X	res	X	ies	X	res	NO
	If "No" to line 1, did the following apply?	• •	1 ^		Λ				
	<u> </u>		X		X		Х		
	Rebate not due yet?		X	X	Λ	X	Λ		
	Exception to rebate?		X	Λ	Х	X	X		
<u> </u>	No rebate due?		A		Ι Λ		Α		
	performed								
3	· · · · · · · · · · · · · · · · · · ·				Х		Х	1	
<u> </u>	19 THE DOING 1990E A MAHADIE LATE 1990E!	Λ			Λ			hadula K (Fa	rm 990) 2022

Part IV	Arbitrage (continued)	ROBERT W. WOODRUFF ARTS CENTER									
		Α		E	3		C		D		
4a Has	the organization or the governmental issuer entered into a qualified	Yes	No	Yes	No	Yes	No	Yes	No		
	ge with respect to the bond issue?		Х		Х		Х				
	ne of provider										
	m of hedge										
	s the hedge superintegrated?										
	s the hedge terminated?										
	re gross proceeds invested in a guaranteed investment contract (GIC)?		Х		Х		Х				
b Nai	ne of provider										
	m of GIC										
d Wa	s the regulatory safe harbor for establishing the fair market value of the GIC satisfied?										
	re any gross proceeds invested beyond an available temporary period?		Х		Х		Х				
7 Has	the organization established written procedures to monitor the										
req	uirements of section 148?	X		X		X					
Part V	Procedures To Undertake Corrective Action	•	•			•	•				
			A	E	3		С	ı	D		
Has	the organization established written procedures to ensure that violations	Yes	No	Yes	No	Yes	No	Yes	No		
	federal tax requirements are timely identified and corrected through the										
	untary closing agreement program if self-remediation isn't available under										
app	licable regulations?		Х		X		X				
Part VI	Supplemental Information. Provide additional information for responses to	o question	s on Sche	dule K. Se	e instruct	ions.					
i ait vi		o quodiioi	011 00110		- monace						

Part VI Supplemental Information. Provide additional information for responses to questions on Schedule K (see instructions) (Continued)

SCHEDULE K, PART I, LINE A

ON SEPTEMBER 24, 2009, THE DEVELOPMENT AUTHORITIES OF FULTON AND DEKALB COUNTIES ISSUED THREE SERIES OF BONDS FOR THE BENEFIT OF THE ROBERT W. WOODRUFF ARTS CENTER, INC. UNDER TREASURY REGULATION SECTION 1.150-1(C), THE THREE SERIES OF BONDS WERE CONSIDERED A SINGLE "ISSUE" FOR FEDERAL INCOME TAX PURPOSES AND ARE SHOWN COLLECTIVELY ON LINE A. THE RELEVANT INFORMATION REGARDING THE SEPARATE SERIES OF BONDS IS AS FOLLOWS:

- (A) ISSUER NAME: DEVELOPMENT AUTHORITY OF DEKALB COUNTY
- (B) ISSUER EIN: 58-1500666
- (C) CUSIP #: 240463JG5
- (D) DATE ISSUED: 9/24/09
- (E) ISSUE PRICE: \$5,343,160
- (F) DESCRIPTION OF PURPOSE: REFUND 2/1/02

THE PRINCIPAL \$5,235,000 OF DEVELOPMENT AUTHORITY OF DEKALB COUNTY BONDS, CUSIP 240463JG5, WAS REPAID ON 3/15/2015.

- (A) ISSUER NAME: DEVELOPMENT AUTHORITY OF FULTON COUNTY
- (B) ISSUER EIN: 58-1639487
- (C) CUSIP #: 359900ZQ3
- (D) DATE ISSUED: 9/24/09
- (E) ISSUE PRICE: \$125,692,191
- (F) DESCRIPTION OF PURPOSE: REFUND 2/1/02, 4/28/04, 1/16/08
- (A) ISSUER NAME: DEVELOPMENT AUTHORITY OF FULTON COUNTY
- (B) ISSUER EIN: 58-1639487
- (C) CUSIP #: 359900ZL4
- (D) DATE ISSUED: 9/24/09
- (E) ISSUE PRICE: \$65,000,000
- (F) DESCRIPTION OF PURPOSE: REFUND 2/1/02
- (A) ISSUER NAME: DEVELOPMENT AUTHORITY OF FULTON COUNTY
- (B) ISSUER EIN: 58-1639487
- (C) CUSIP #: 3599007B7
- (D) DATE ISSUED: 12/30/2015
- (E) ISSUE PRICE: \$43,710,329
- (F) DESCRIPTION OF PURPOSE: REFUND 9/24/09

A PORTION OF THE DEVELOPMENT AUTHORITY OF FULTON COUNTY BONDS, CUSIP 359900ZL4, HAS BEEN REDEEMED, BUT NO OTHER PORTION HAS BEEN DEFEASED.

NONE OF THE BONDS WAS APPLIED AS AN "ON BEHALF OF" ISSUER, AND NO PORTION

Part VI Supplemental Information. Provide additional information for responses to questions on Schedule K (see instructions) (Continued)

OF THE BONDS WAS A "POOLED FINANCING."

SCHEDULE K, PART II, LINE 1

DEVELOPMENT AUTHORITY OF DEKALB COUNTY BONDS, CUSIP 240463JG5, IN THE AMOUNT OF \$5,235,000 MATURED AND WAS REDEEMED ON MARCH 15, 2016. A PORTION OF THE DEVELOPMENT AUTHORITY OF FULTON COUNTY BONDS, CUSIP 359900ZL4, IN THE AMOUNT OF \$15,420,000 WAS REDEEMED ON JUNE 24, 2014. A PORTION OF THE DEVELOPMENT AUTHORITY OF FULTON COUNTY BONDS, CUSIP 359900ZQ3, IN THE AMOUNT OF \$57,600,000 WAS REDEEMED ON MARCH 15, 2016.

SCHEDULE K, PART IV, LINE 2

A REBATE COMPUTATION SHOWING NO AMOUNT DUE WAS PERFORMED AS OF SEPTEMBER 24, 2014.

SCHEDULE M (Form 990)

Noncash Contributions

Complete if the organizations answered "Yes" on Form 990, Part IV, lines 29 or 30. Attach to Form 990.

OMB No. 1545-0047 Inspection

Department of the Treasury Internal Revenue Service Name of the organization

Go to www.irs.gov/Form990 for instructions and the latest information.

ROBERT W. WOODRUFF ARTS CENTER Employer identification number

ROB	ROBERT W. WOODRUFF ARTS CENTER, INC. 58-0633971									
Par	Types of Property									
		(a) Check if applicable	(b) Number of contributions or items contributed	(c) Noncash contribution amounts reported on Form 990, Part VIII, line	noncash cont	(d) f determinir tribution am				
1	Art - Works of art									
2	Art - Historical treasures									
3	Art - Fractional interests									
4	Books and publications									
5	Clothing and household goods									
6	Cars and other vehicles									
7	Boats and planes									
8	Intellectual property									
9	Securities - Publicly traded		78	11,440,456	. STOCK QUO	TE				
10	Securities - Closely held stock				~					
11	Securities - Partnership, LLC, or trust interests									
12	Securities - Miscellaneous									
13	Qualified conservation									
10	contribution - Historic									
	structures									
14	Qualified conservation									
	contribution - Other									
15	Real estate - Residential									
16	Real estate - Commercial									
17	Real estate - Other									
18	Collectibles									
19	Food inventory									
20	Drugs and medical supplies									
21	Taxidermy									
22	Historical artifacts									
23	Scientific specimens									
24	Archeological artifacts									
25	Other ►(SEE SUPP PAGE)		11.	164,306	j.					
26	Other ►()									
27	Other ►()									
28	Other ►(
29	Number of Forms 8283 received			ear for contributions for	or					
	which the organization completed F		•				23			
						Yes	No			
30a	During the year, did the organizat	ion receive	by contribution any prope	rty reported in Part I, I	lines 1 through					
	28, that it must hold for at least the	hree years f	rom the date of the initial	contribution, and whic	h isn't required					
	to be used for exempt purposes for	the entire h	olding period?			30a	Х			
b	If "Yes," describe the arrangement i	n Part II.								
31	Does the organization have a	gift accept	ance policy that require	es the review of an	y nonstandard					
	contributions?		· · · · · · · · · · · · · · · · · · ·		-	31 X				
32a	Does the organization hire or use									
	contributions?	-		· · · · · · · · · · · · · · · · · · ·		32a X				
b	If "Yes," describe in Part II.									
	If the organization didn't report an describe in Part II.	amount in c	olumn (c) for a type of pro	perty for which column	ı (a) is checked,					

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule M (Form 990) 2022

Part II Supplen

Supplemental Information. Provide the information required by Part I, lines 30b, 32b, and 33, and whether the organization is reporting in Part I, column (b), the number of contributions, the number of items received, or a combination of both. Also complete this part for any additional information.

SCHEDULE M, PART I, LINE 1

UNDER SFAS 116, THE ORGANZATION DOES NOT REPORT REVENUES FOR ARTWORK AND COLLECTIONS RECEIVED ON ITS FINANCIAL STATEMENTS AS REPORTED ON LINE 1 OF SCHEDULE M.

SCHEDULE M, PART I, LINE 32B

ANY NON-CASH CONTRIBUTIONS IN THE FORM OF STOCKS ARE IMMEDIATELY SENT TO STATE STREET FOR LIQUIDATION, SO THE STOCKS CAN BE CONVERTED TO CASH.

SCHEDULE M, PART I, COLUMN (B)

THIS COLUMN REPRESENTS THE NUMBER OF CONTRIBUTIONS THE ORGANIZATION RECEIVED.

Supplemental Information. Provide the information required by Part I, lines 30b, 32b, and 33, and whether the organization is reporting in Part I, column (b), the number of contributions, the number of items received, or a combination of both. Also complete this part for any additional information.

TOTALS		11.	164,306.	
FURNITURE	X 	2	25,992.	FMV
MUSICAL INSTRUM	X	1	45,202.	FMV
FOOD & BEVERAGE	X	8	93,112.	FMV
DESCRIPTION	(A) CHECK	(B) NUMBER OF CONTRIBUTIONS	(C) REVENUES REPORTED	(D) METHOD OF DETERMINING
SCHEDULE M, PART I	: - OTHER NON	S =		

SCHEDULE O (Form 990 or 990-EZ)

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

OMB No. 1545-0047

2022

Open to Public Inspection

Department of the Treasury Internal Revenue Service

Name of the organization

► Information about Schedule O (Form 990 or 990-EZ) and its instructions is at www.irs.gov/form990.

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

FORM 990, PART VI, SECTION A, LINE 2

JAMES W. BOSWELL AND JOSHUA M. KAMIN - BUSINESS RELATIONSHIP

JANINE BROWN AND ANGELA SPIVEY - BUSINESS RELATIONSHIP

LARRY MARK AND JOHN MURPHY - BUSINESS RELATIONSHIP

W. STANLEY BLACKBURN AND WAB P. KADABA - BUSINESS RELATIONSHIP

JAMES B. HANNAN AND DAVID PARK - BUSINESS RELATIONSHIP

ALDO LAFIANDRA AND LIZANNE THOMAS - BUSINESS RELATIONSHIP

FORM 990, SECTION B, PART VI, LINE 11A

THE FORM 990 IS COMPLETED ANNUALLY AND COPIES ARE PROVIDED TO THE ENTIRE BOARD OF TRUSTEES AS WELL AS THE PRESIDENT/CEO OF THE ORGANIZATION. THE DRAFT 990 IS ALSO PRESENTED TO THE GOVERNING BOARD AND THE AUDIT COMMITTEE, WHICH HAS THE OPPORTUNITY TO ASK QUESTIONS, AND PROVIDE FEEDBACK OR COMMENTS WHICH ARE ADDRESSED AS NECESSARY. A COPY OF THE APPROVED, SIGNED FORM 990 IS PROVIDED TO ALL OFFICERS, DIRECTORS, AND TRUSTEES BEFORE THE RETURN IS FILED.

FORM 990, SECTION B, PART VI, LINE 12C

ROBERT W. WOODRUFF ARTS CENTER, INC. (THE "ARTS CENTER") MAINTAINS A

CONFLICT-OF-INTEREST POLICY, ORIGINALLY ADOPTED BY THE BOARD OF TRUSTEES

IN 1995, AS AMENDED THEREAFTER (THE "POLICY"). THIS POLICY APPLIES TO ALL

ART CENTER TRUSTEES, OFFICERS AND EMPLOYEES, AS WELL AS OTHER ARTS CENTER

REPRESENTATIVES.

THE POLICY IS INTENDED TO PREVENT THE ARTS CENTER FROM ENGAGING WITH
RELATED PERSONS IN TRANSACTIONS WHICH ARE IMPERMISSIBLE OR IMPROPER UNDER
GEORGIA NONPROFIT CORPORATION LAW OR FEDERAL TAX LAW (ALTHOUGH THE POLICY

SCHEDULE O (Form 990 or 990-EZ)

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

▶ Attach to Form 990 or 990-EZ.

OMB No. 1545-0047

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Employer identification number

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ROBERT W. WOODRUFF ARTS CENTER, INC

58-0633971

IS MORE EXPANSIVE THAN THESE LAWS.) THE KEY DEFINITIONS UNDER THE POLICY

ARE "INSIDER", "FAMILY MEMBER," AND "RELATED PARTY." THE POLICY IS

REVIEWED AND UPDATED (IF NECESSARY) ON AN ANNUAL BASIS.

THE UPDATED DOCUMENT IS THEN DISTRIBUTED TO THE AUDIT COMMITTEE FOR
REVIEW AND APPROVAL. A COPY OF THE POLICY AND A RELATED QUESTIONNAIRE IS
THEN DISTRIBUTED ANNUALLY TO ALL ARTS CENTER TRUSTEES, OFFICERS AND
SENIOR MANAGEMENT, AS WELL AS OTHER ARTS CENTER REPRESENTATIVES. ONCE
RESPONSES ARE OBTAINED, THEY ARE REVIEWED AND RESULTS COMPILED, INCLUDING
A LIST OF POTENTIAL CONFLICTS TO BE REVIEWED BY THE AUDIT COMMITTEE AND
MANAGEMENT.

THE AUDIT COMMITTEE WILL DETERMINE WHETHER A BUSINESS OR FINANCIAL RELATIONSHIP INVOLVING A TRUSTEE OR OFFICER SHOULD BE ENTERED INTO OR CONTINUED. IN THE CASE OF ANY SUCH RELATIONSHIP INVOLVING A TRUSTEE, SUCH A DETERMINATION SHALL BE SET FORTH IN A WRITTEN REPORT OF THE AUDIT COMMITTEE, SIGNED BY THE CHAIRMAN AND A MAJORITY OF THE COMMITTEE, AND PROVIDED TO THE BOARD OF TRUSTEES.

IF THE GOVERNING BOARD OR COMMITTEE HAS REASONABLE CAUSE TO BELIEVE A
TRUSTEE, OFFICER, EMPLOYEE, OR OTHER REPRESENTATIVE HAS FAILED TO
DISCLOSE ACTUAL OR POSSIBLE CONFLICTS OF INTEREST, IT SHALL INFORM THE
INDIVIDUAL OF THE BASIS FOR SUCH BELIEF AND ALLOW HIM/HER AN OPPORTUNITY
TO EXPLAIN THE ALLEGED FAILURE TO DISCLOSE. IF, AFTER HEARING THE
RESPONSE AND AFTER MAKING FURTHER INVESTIGATION AS WARRANTED BY THE

SCHEDULE O (Form 990 or 990-EZ)

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

Attach to Form 990 or 990-EZ.

OMB No. 1545-0047

Open to Public Inspection

Employer identification number

Department of the Treasury Internal Revenue Service

Name of the organization

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ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

CIRCUMSTANCES, THE GOVERNING BOARD OR COMMITTEE DETERMINES THE TRUSTEE,
OFFICER, EMPLOYEE, OR OTHER REPRESENTATIVE HAS FAILED TO DISCLOSE AN
ACTUAL OR POSSIBLE CONFLICT OF INTEREST, IT SHALL TAKE APPROPRIATE
DISCIPLINARY AND CORRECTIVE ACTION.

FORM 990, PART VI, SECTION B, LINES 15A & 15B

THE DETERMINATION OF COMPENSATION FOR THE OFFICERS AND OTHER KEY

EMPLOYEES IS THE RESPONSIBILITY OF THE BOARD OF DIRECTORS OF THE ROBERT

W. WOODRUFF ARTS CENTER, INC. WHICH HAS DELEGATED THIS TO THE

COMPENSATION COMMITTEE. THE COMPENSATION COMMITTEE IS COMPOSED OF

INDEPENDENT BOARD MEMBERS WHOSE RESPONSIBILITIES INCLUDE, IN PART, THE

REVIEW AND APPROVAL OF THE COMPENSATION FOR THE OFFICERS AND KEY

EMPLOYEES. THE COMPENSATION AGREEMENTS DELIBERATED BY THE COMMITTEE ARE

DETERMINED BASED ON COMPARABLE DATA WHICH IS DOCUMENTED IN THE RECORDS OF

THE COMMITTEE'S WORK. SUCH DOCUMENTATION IS MEANT TO MEET OR EXCEED THE

REQUIREMENTS WHICH WOULD SATISFY THE REBUTTABLE PRESUMPTION CRITERIA

UNDER THE INTERMEDIATE SANCTIONS LANGUAGE OF THE IRS. AS THE COMPOSITION

OF THE COMPENSATION COMMITTEE IS COMPRISED EXCLUSIVELY OF BOARD MEMBERS,

EACH BOARD MEMBER COMPLETES A CONFLICT-OF-INTEREST STATEMENT WHICH IS

REVIEWED BY THE CENTER'S MANAGEMENT PRIOR TO THE COMPLETION AND FILING OF

THE RETURN.

FORM 990, PART VI, SECTION C, LINE 19

GOVERNING DOCUMENTS FOR THE ROBERT W. WOODRUFF ARTS CENTER, INC. ARE REGISTERED WITH THE STATE OF GEORGIA. CONFLICT OF INTEREST POLICY AND FINANCIAL STATEMENTS ARE AVAILABLE UPON REQUEST.

FORM 990, PART XI, LINE 8

SCHEDULE O (Form 990 or 990-EZ)

Supplemental Information to Form 990 or 990-EZ

Complete to provide information for responses to specific questions on Form 990 or 990-EZ or to provide any additional information.

► Attach to Form 990 or 990-EZ.

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2022

Open to Public Inspection

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Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

\$ (452,590) WRITE OFF OF PRIOR YEAR PLEDGES

FORM 990, PART XI, LINE 9

\$ (1,173,495)	CHANGE	IN	INTEREST	RATE	SWAP	VALUE
------	------------	--------	----	----------	------	------	-------

\$ (1,686,640) CHANGE IN SPLIT INTEREST AGREEMENTS

\$ 447,655 CHANGE IN MINIMUM PENSION LIABILITY

\$ (2,412,480)

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number

58-0633971

FORM 990, PART III - PROGRAM SERVICE

LINE 4B, PROGRAM SERVICE

HIGH MUSEUM OF ART: LOCATED IN THE HEART OF ATLANTA, THE HIGH MUSEUM OF ART CONNECTS WITH AUDIENCES FROM ACROSS THE SOUTHEAST AND AROUND THE WORLD THROUGH ITS DISTINGUISHED COLLECTION, DYNAMIC SCHEDULE OF SPECIAL EXHIBITIONS AND ENGAGING COMMUNITY-FOCUSED PROGRAMS. HOUSED WITHIN FACILITIES DESIGNED BY PRITZKER PRIZE-WINNING ARCHITECTS RICHARD MEIER AND RENZO PIANO, THE HIGH FEATURES A COLLECTION OF MORE THAN 19,000 WORKS OF ART, INCLUDING AN EXTENSIVE ANTHOLOGY OF 19TH- AND 20TH-CENTURY AMERICAN FINE AND DECORATIVE ARTS; MAJOR HOLDINGS OF PHOTOGRAPHY AND FOLK AND SELF-TAUGHT WORK, ESPECIALLY THAT OF ARTISTS FROM THE AMERICAN SOUTH; BURGEONING COLLECTIONS OF MODERN AND CONTEMPORARY ART, INCLUDING PAINTINGS, SCULPTURE, NEW MEDIA AND DESIGN; A GROWING COLLECTION OF AFRICAN ART, WITH WORK DATING FROM PREHISTORY THROUGH THE PRESENT; AND SIGNIFICANT HOLDINGS OF EUROPEAN PAINTINGS AND WORKS ON PAPER. THE HIGH IS DEDICATED TO REFLECTING THE DIVERSITY OF ITS COMMUNITIES AND OFFERING A VARIETY OF EXHIBITIONS AND EDUCATIONAL PROGRAMS THAT ENGAGE VISITORS WITH THE WORLD OF ART, THE LIVES OF ARTISTS AND THE CREATIVE PROCESS.

LINE 4C, PROGRAM SERVICE

ALLIANCE THEATRE: THE ALLIANCE THEATRE IS THE LEADING PRODUCING THEATRE IN THE SOUTHEAST, CREATING THE POWERFUL EXPERIENCE OF SHARED THEATRE FOR DIVERSE PEOPLE. WITH A COMMITMENT TO LEAD THE NATIONAL FIELD BY DEEPLY ENGAGING WITH ITS LOCAL COMMUNITY, MODELING RADICAL INCLUSION AND CATALYTIC EXPERIENCES ON OUR STAGES, IN OUR CLASSROOMS, AND THROUGHOUT ATLANTA, THE ALLIANCE THEATRE HAS PLAYED AN IMPORTANT ROLE SINCE ITS INCEPTION IN 1968. UNDER THE LEADERSHIP OF SUSAN V. BOOTH, JENNINGS HERTZ ARTISTIC DIRECTOR, THE ALLIANCE THEATRE RECEIVED THE REGIONAL THEATRE TONY AWARD ® IN RECOGNITION OF SUSTAINED EXCELLENCE IN PROGRAMMING EDUCATION, AND COMMUNITY ENGAGEMENT. AS THE LEADING PRODUCING THEATER IN THE SOUTHEAST, THE ALLIANCE THEATRE REACHES MORE THAN 165,000 PATRONS ANNUALLY WHILE DELIVERING POWERFUL PROGRAMMING THAT CHALLENGES ADULT AND YOUTH AUDIENCES TO THINK CRITICALLY AND CARE DEEPLY.

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number
58-0633971

FORM 990, PART VI, LINE 17 - STATES

AL, AK, DC, FL, GA, IL, LA, MI, MS, MO, NH, OH, RI, SC, Name of the organization Employer identification number ROBERT W. WOODRUFF ARTS CENTER, INC. 58-0633971

FORM 990, PART VII-COMPENSATION OF THE 5 HIG	SHEST PAID IND. CONTRACTORS	
NAME AND ADDRESS	DESCRIPTION OF SERVICES	COMPENSATION
ALLIED UNIVERSAL SECURITY SERVICES PO BOX 828854 PHILADELPHIA, PA 19182	SECURITY	2,158,673.
HOLDER CONSTRUCTION GROUP, LLC 3300 RIVERWOOD PKWY, STE 1200 ATLANTA, GA 30339	CONSTRUCTION	1,352,305.
PEACHTREE TENTS & EVENTS 5901 CALIFORNIA AVE, STE 218 NASHVILLE, TN 37209	CONTRACTED SERVICES	522,947.
Q&S ELECTRICAL CONTRACTORS, LLC 2146 OLD GEORGIAN TERR NW ATLANTA, GA 30318	CONTRACTED SERVICES	415,730.
OPUS 3 ARTISTS 248 W 57TH ST, STE 282 NEW YORK, NY 10019	CONTRACTED SERVICES	336,191.

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number
58-0633971

FORM 990, PART X - INVESTMENTS - PUBLICLY TRADED SECURITIES

	BEGINNING	ENDING	COST
DESCRIPTION	BOOK VALUE	BOOK VALUE	OR FMV
CASH & EQUIVALENTS	6,583,308.	31,476,912.	
EQUITY SECURITIES- DOMESTIC	31,514,310.	32,727,565.	
COMMINGLED FUNDS	247,714,693.	229,302,100.	
REAL ASSET FUNDS	5,080,315.	5,009,583.	
TOTALS			
	290,892,626.	298,516,160.	
	==========	==========	

SCHEDULE R (Form 990)

Related Organizations and Unrelated Partnerships

Complete if the organization answered "Yes" on Form 990, Part IV, line 33, 34, 35b, 36, or 37.

Attach to Form 990.

Department of the Treasury Internal Revenue Service

Go to www.irs.gov/Form990 for instructions and the latest information.

OMB No. 1545-0047

2022

Open to Public Inspection

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number
58-0633971

Part I Identification of Disregarded Entities. Complete if the organization answered "Yes" on Form 990, Part IV, line 33.

(a Name, address, and EIN (if ap		(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Total income	(e) End-of-year assets	(f) Direct controlli entity	ng
(1) ASO PRODUCTIONS, LLC	85-3846658						
1280 PEACHTREE ST NE	ATLANTA, GA 30309	INVESTMENT	GA	NONE	NONE	WOODRUFF	ART
(2) ALLIANCE THEATRE PRODUCTION	NS, LLC 85-4027099						
1280 PEACHTREE ST NE	ATLANTA, GA 30309	INVESTMENT	GA	NONE	NONE	WOODRUFF	ART
(3)							
(4)							
(5)							
(6)							

Part II Part II Identification of Related Tax-Exempt Organizations. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related tax-exempt organizations during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Exempt Code section	(e) Public charity status (if section 501(c)(3))	(f) Direct controlling entity	conti	(a) 512(b)(13) rolled ity?
						Yes	No
(1) ENCORE PARK FOR THE ARTS, INC. 16-1661377							
1280 PEACHTREE STREET NE ATLANTA, GA 30309	FUNDRAISING	GA	501(C)(3)	509(A)(3)	WAC		Х
(2)							
(3)							
(4)							
(5)							
(6)							
(7)							
	<u> </u>		-	1		:	201 200

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Schedule R (Form 990) 2022

Part III Identification of Related Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a partnership during the tax year.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(e) Predominant income (related, unrelated, excluded from tax under sections 512 - 514)	(f) Share of total income	(g) Share of end-of- year assets	Disprop	h) portionate ations?	(i) Code V - UBI amount in box 20 of Schedule K-1 (Form 1065)	managing partner?		(k) Percentage ownership
		Country)					Yes	No		Yes	No	
(1)												
(2)												
(3)												
_(4)												
(5)												
(6)												
<u>(7)</u>												

Part IV Identification of Related Organizations Taxable as a Corporation or Trust. Complete if the organization answered "Yes" on Form 990, Part IV, line 34, because it had one or more related organizations treated as a corporation or trust during the tax year.

	<u> </u>			, ,					
(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)		(e) Type of entity (C corp, S corp, or trust)	(f) Share of total income	(g) Share of end-of-year assets	(h) Percentage ownership	Section 512(b) control entit	ion)(13) olled :y?
								Yes I	No
(1) E P MCBURNEY TRUST 58-6029235									
303 PEACHTREE ST ATLANTA, GA 30308	TRUST-INVESTING	GA	TRUIST	TRUST		7,981,994.			Х
(2) E P MCBURNEY TRUST 58-6029260									
303 PEACHTREE STREET ATLANTA, GA 30308	TRUST-INVESTING	GA	TRUIST	TRUST		1,299,580.			Х
(3) LUCY CLAIR HARRIS TRUST 58-6163824									
ONE WEST 4TH ST WINSTON-SALEM, NC 27101	TRUST-INVESTING	GA	WELLS FARGO	TRUST		159,926.			Х
(4) CHARITABLE REMAINEDER TRUST (4) 99-9999999									
	TRUST INVESTING	GA	VARIOUS	TRUST					Х
(5)									_
<u> </u>									
(6)									
									
(7)									_
<u>, , , , , , , , , , , , , , , , , , , </u>									

Yes No

Note: Complete line 1 if any entity is listed in Parts II, III, or IV of this schedule.

58-0633971

Part V	Transactions With Related Organizations	. Complete if the or	ganization answered "Ye	s" on Form 990, F	Part IV, line 34, 35b, or 36.

1	During the tax year, did the organization engage in any of the following transactions with one or more rela	ated organizations iis	ted in Parts II-IV?			
а	Receipt of (i) interest, (ii) annuities, (iii) royalties, or (iv) rent from a controlled entity.				1a	Х
	Gift, grant, or capital contribution to related organization(s)				1b	X
	Gift, grant, or capital contribution from related organization(s).				1c	X
	Loans or loan guarantees to or for related organization(s)				1d	X
					1e	X
e	Loans or loan guarantees by related organization(s)					21
	District from a data decrease front				1f	X
T	Dividends from related organization(s)					X
g	Sale of assets to related organization(s)				1g	
h	Purchase of assets from related organization(s).				1h	X
i	Exchange of assets with related organization(s)				1i	X
j	Lease of facilities, equipment, or other assets to related organization(s)				1j	X
k	Lease of facilities, equipment, or other assets from related organization(s)				1k	X
1	Performance of services or membership or fundraising solicitations for related organization(s)				11	X
	Performance of services or membership or fundraising solicitations by related organization(s).				1m	X
n	Sharing of facilities, equipment, mailing lists, or other assets with related organization(s)				1n	Х
	Sharing of paid employees with related organization(s)				10	X
•						
n	Reimbursement paid to related organization(s) for expenses				1p	Х
	Reimbursement paid by related organization(s) for expenses				1q	X
Ч	Relinbursement paid by related organization(s) for expenses				14	21
					1-	v
r	Other transfer of cash or property to related organization(s)				1r	X
2	Other transfer of cash or property from related organization(s)	a lina inaludina aava	red relationships and transa	ation thro	1s	
			•	action three		·
	(a) Name of related organization	(b) Transaction	(c) Amount involved	Method	(d) of deten	mining
		type (a - s)		amou	ınt invol	/ed
(1)						
(2)						
(3)						
(4)						
(5)						

Part VI Unrelated Organizations Taxable as a Partnership. Complete if the organization answered "Yes" on Form 990, Part IV, line 37.

Provide the following information for each entity taxed as a partnership through which the organization conducted more than five percent of its activities (measured by total assets or gross revenue) that was not a related organization. See instructions regarding exclusion for certain investment partnerships.

	(a) Name, address, and EIN of entity	(b) Primary activity	(c) Legal domicile (state or foreign country)	income (related,	sec	e) partners ction (c)(3) zations?	(f) Share of total income	al income end-of-year allocations amount in box 2		Disproportionate allocations? Code V - UBI amount in box 20 of Schedule K-1 (Form 1065)		(j) General or managing partner?		ownership	
				from tax under sections 512 - 514)	Yes	No			Yes	No	(1 01111 1000)	Yes	No		
(1)															
(2)															
(3)															
(4)															
(5)															
(6)															
(7)															
(8)															
(9)															
(10)															
(16)															

Schedule R (Form 990) 2022

Supplemental Information

Provide additional information for responses to questions on Schedule R. See instructions.

Taxpayer's Name ROBERT W. WOODRU	FF ARTS CEN	TER, I	INC.					Identify	ring Number 3971
DESCRIPTION OF PROPERTY PROPERTY									
	ctively participate in th	ne operation	of the ac	tivity dı	ring the tax year?				
TYPE OF PROPERTY:	ouvery participate in ti	io operation	01 1110 40	tivity u	aring the tax year.				
THE OF TROPERTY.									
OTHER INCOME:									
TOTAL GROSS INCOME									
OTHER EXPENSES:									
DERDEGIATION (QUOWN DELOW)					. 51,29) E			
DEPRECIATION (SHOWN BELOW)						73.			
LESS: Beneficiary's Portion					•				
AMORTIZATION									
LESS: Beneficiary's Portion									
DEPLETION									
LESS: Beneficiary's Portion					•				F1 20F
TOTAL EXPENSES									51,295.
TOTAL RENT OR ROYALTY INCOME	E (LOSS)								-51,295.
Less Amount to									
Rent or Royalty									
Depreciation									
Depletion									
Investment Interest Expense									
Other Expenses									
Net Income (Loss) to Others .									
Net Rent or Royalty Income (Loss)									-51,295.
Deductible Rental Loss (if Applicable									
SCHEDULE FOR DEPRECIAT	ION CLAIMED								
(a) Description of property	(b) Cost or	(c) Date	(d) ACRS	(e) Bus.	(f) Basis for	(g) Depreciation	(h)	(i) Life	(j) Depreciation
(=) = =====	unadjusted basis	acquired	des.	%	depreciation	prior years	Method	rate	for this year
SEE STATEMENT									
							-		
							-	-	
Totals									51,295.
	i .								· · · · · · · · · · · · · · · · · · ·

Taxpayer's Name ROBERT W. WOODRU	FF ARTS CEN	TER, I	NC.					Identify	ring Number 3971
DESCRIPTION OF PROPERTY PARKING LOTS AND		·							
·	ctively participate in th	ne operation	of the ac	rtivity di	uring the tax year?				
TYPE OF PROPERTY:	ctively participate in ti	ic operation	or the ac	otivity at	uning the tax year:				
THE OF TROFERTY.									
OTHER INCOME:									
TOTAL GROSS INCOME									
OTHER EXPENSES:									
DERDEGIATION (QUIONAL DEL CIA)					. 7,80)6			
DEPRECIATION (SHOWN BELOW)									
LESS: Beneficiary's Portion					•				
AMORTIZATION									
LESS: Beneficiary's Portion									
DEPLETION									
LESS: Beneficiary's Portion					· · · · · · · · · · · · · · · · · · ·				7 006
TOTAL EXPENSES									7,806.
TOTAL RENT OR ROYALTY INCOME	E (LOSS)								-7,806.
Less Amount to									
Rent or Royalty									
Depreciation									
Depletion									
Investment Interest Expense									
Other Expenses									
Net Income (Loss) to Others								•	7 006
Net Rent or Royalty Income (Loss)								•	-7,806.
Deductible Rental Loss (if Applicable SCHEDULE FOR DEPRECIAT				<u></u>					
SCHEDOLE FOR DEFRECIAL	ION CLAIMED							1	1
(a) Description of property	(b) Cost or unadjusted basis	(c) Date acquired	(d) ACRS des.	(e) Bus. %	(f) Basis for depreciation	(g) Depreciation in prior years	(h) Method	(i) Life or rate	(j) Depreciation for this year
SEE STATEMENT									
									ļ
Totala									7,806.
Totals	I .	1							1,000.

Taxpayer's Name ROBERT W. WOODRU	FF ARTS CEN	TER, I	NC.					Identify	ing Number 3971
DESCRIPTION OF PROPERTY GIFT SHOP									
T	ctively participate in th	e operation	of the ac	tivity d	luring the tax year?				
TYPE OF PROPERTY:	, , , , ,	<u>'</u>							
OTHER INCOME:									
TOTAL GROSS INCOME OTHER EXPENSES:									
OTHER EXPENSES.									
DEPRECIATION (SHOWN BELOW) LESS: Beneficiary's Portion						6.			
AMORTIZATION LESS: Beneficiary's Portion									
DEPLETION									
TOTAL EXPENSES									20,796.
TOTAL RENT OR ROYALTY INCOME	(LOSS)								-20,796.
Less Amount to Rent or Royalty Depreciation Investment Interest Expense Other Expenses Net Income (Loss) to Others .									
Net Rent or Royalty Income (Loss)									-20,796.
Deductible Rental Loss (if Applicable									, -
SCHEDULE FOR DEPRECIAT									
(a) Description of property	(b) Cost or unadjusted basis	(c) Date acquired	(d) ACRS des.	(e) Bus. %	(f) Basis for depreciation	(g) Depreciation in prior years	(h) Method	(i) Life or rate	(j) Depreciation for this year
SEE STATEMENT									
Totals									20,796.
					<u> </u>				,

Taxpayer's Name ROBERT W. WOODRUFF ARTS CENTER, INC. 1denti 58-06										
DESCRIPTION OF PROPERTY		•								
LESSOR OF NONRES	<u>IDENTIAL BU</u>	ILDING	}							
Yes No Did you ac	ctively participate in th	e operation of	of the ac	tivity d	luring the tax year?					
TYPE OF PROPERTY:										
OTHER INCOME:										
TOTAL GROSS INCOME										
OTHER EXPENSES:										
DEPRECIATION (SHOWN BELOW)										
LESS: Beneficiary's Portion										
AMORTIZATION										
LESS: Beneficiary's Portion DEPLETION										
LESS: Beneficiary's Portion										
TOTAL EXPENSES										
TOTAL RENT OR ROYALTY INCOME										
Less Amount to										
Rent or Royalty										
Depreciation										
Depletion										
Investment Interest Expense						• • • • • • • • • • • • • • • • • • • •				
Other Expenses Net Income (Loss) to Others						• • • •				
Net Rent or Royalty Income (Loss)								•		
Deductible Rental Loss (if Applicable										
SCHEDULE FOR DEPRECIAT										
(a) Description of property	(b) Cost or unadjusted basis	(c) Date	(d) ACRS des.	(e) Bus. %	(f) Basis for depreciation	(g) Depreciation in prior years	(h) Method	(i) Life or rate	(j) Depreciation for this year	
Totals										

Taxpayer's Name ROBERT W. WOODRU	FF ARTS CEN	TER, I	INC.					Identify	ring Number 3971
DESCRIPTION OF PROPERTY EVENTS AND CATER									
	ctively participate in th	ne operation	of the ac	tivity d	uring the tay year?				
TYPE OF PROPERTY:	ctively participate in ti	ic operation	or the ac	otivity di	uning the tax year:				
THE OF TROFERTY.									
OTHER INCOME:									
TOTAL GROSS INCOME									
OTHER EXPENSES:									
						_			
DEPRECIATION (SHOWN BELOW)						39.			
LESS: Beneficiary's Portion					-				
AMORTIZATION									
LESS: Beneficiary's Portion									
DEPLETION									
LESS: Beneficiary's Portion									
TOTAL EXPENSES									83,539.
TOTAL RENT OR ROYALTY INCOME	E (LOSS)								-83,539.
Less Amount to									
Rent or Royalty									
Depreciation									
Depletion									
Investment Interest Expense									
Other Expenses									
Net Income (Loss) to Others .									
Net Rent or Royalty Income (Loss)									-83,539.
Deductible Rental Loss (if Applicable	e)								
SCHEDULE FOR DEPRECIAT	ION CLAIMED								
(a) Description of property	(b) Cost or	(c) Date	(d) ACRS	(e)	(f) Basis for	(g) Depreciation	(h)	(i) Life	(j) Depreciation
(a) Description of property	unadjusted basis	acquired	des.	Bus.	depreciation	in prior years	Method	or rate	for this year
			uoo.	,,,		prior youro		Tato	
SEE STATEMENT									
Totals									83,539.

Taxpayer's Name ROBERT W. WOODRU		ד מינייני	INC					Identify	ring Number
	FF AKIS CEN	ILEK, I	INC.				56	-003	39/1
DESCRIPTION OF PROPERTY									
Yes No Did you ac	ctively participate in th	e operation	of the ac	ctivity d	uring the tax year?				
TYPE OF PROPERTY:									
OTHER INCOME:									
TOTAL GROSS INCOME									
OTHER EXPENSES:									
DEPRECIATION (SHOWN BELOW)									
LESS: Beneficiary's Portion									
AMORTIZATION					•				
LESS: Beneficiary's Portion .									
DEPLETION									
LESS: Beneficiary's Portion									
TOTAL EXPENSES									
TOTAL RENT OR ROYALTY INCOME									
Less Amount to	(2000) 111111								
Rent or Royalty									
Depreciation									
Depletion									
Investment Interest Expense									
Other Expenses						·			
Net Income (Loss) to Others .									
Net Rent or Royalty Income (Loss)									
Deductible Rental Loss (if Applicable									
SCHEDULE FOR DEPRECIAT	ION CLAIMED							1	
			(d)	(0)		(g) Depreciation		(i) Life	
(a) Description of property	(b) Cost or	(c) Date	ACRS	(e) Bus.	(f) Basis for	in	(h)	or	(j) Depreciation
()	unadjusted basis	acquired	des.	%	depreciation	prior years	Method	rate	for this year
				\vdash					
Totals							<u> </u>	<u> </u>	
									i .

RENT AND ROYALTY SUMMARY

PROPERTY	TOTAL INCOME	DEPLETION/ DEPRECIATION	OTHER EXPENSES	ALLOWABLE NET INCOME
PROPERTY PARKING LOTS AND GAR GIFT SHOP LESSOR OF NONRESIDEN		51,295. 7,806. 20,796.		-51,295. -7,806. -20,796.
EVENTS AND CATERING		83,539.		-83,539.
TOTALS		163,436.	========	-163,436.

SCHEDULE A: EVENTS AND CATERING PART II - LINE 14 - OTHER DEDUCTIONS

EVENTS CONTRACTED SERVICES MANAGEMENT FEE (NON-EMPLOYEES) LEGAL FEE INSURANCE OCCUPANCY OFFICE EXPENSES	703,644. 9,170. 8,182. 4,254. 1,596. 18,999. 456,999.

TOTAL OTHER DEDUCTIONS 1,202,844.

=========

4562

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

OMB No. 1545-0172

Attachment Sequence No. 179

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

Go to www.irs.gov/Form4562 for instructions and the latest information.

Identifying number

ROBERT W. WOODRUFF ARTS CENTER, INC. 58-0633971 Business or activity to which this form relates GENERAL DEPRECIATION 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. Maximum amount (see instructions) Total cost of section 179 property placed in service (see instructions) 2 Threshold cost of section 179 property before reduction in limitation (see instructions) 3 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions 6 (a) Description of property (b) Cost (business use only) Listed property. Enter the amount from line 29 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 Tentative deduction. Enter the **smaller** of line 5 or line 8 9 Carryover of disallowed deduction from line 13 of your 2021 Form 4562 10 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions 11 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11 Carryover of disallowed deduction to 2023. 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 | Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions 15 Other depreciation (including ACRS) 16 163,436. Part | MACRS Depreciation (Don't include listed property. See instructions.) Section A If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here . Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (g) Depreciation deduction (e) Convention (a) Classification of property (business/investment use (f) Method placed in only - see instructions) service 19a 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property f 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MMS/L h Residential rental S/L 27.5 yrs. MM property 39 yrs. MMS/L i Nonresidential real ММ property Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System 20a Class life S/L **b** 12-year 12 yrs. S/I **c** 30-year 30 yrs MMS/L MM d 40-year 40 yrs. S/L Part IV Summary (See instructions.) Listed property. Enter amount from line 28 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter

For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs

163,436.

Forn	n 4562 (2022)													58	-0633	971	Page
_	entertainme Note: For an	erty (Include au ent, recreation, or y vehicle for which	amusem you are us	ent.) sing the	e standa	ard r	nilea	ge rat	te or	dedu	cting	•	. ,			v 24a,	
		s (a) through (c) o													4 1. 9		
246	Section A - a Do you have evidence	Depreciation and			•											T .	37 N.
240	•		(c)	lent use	ciaimeu	<u> </u>	Yes	(e)	NO			es," is th				_ Yes	X No
	(a) Type of property (list vehicles first)	(b) Date placed in service	Business/ investment us percentage	se Cost	(d) or other b	asis	(busir	for depre ess/inve use only	stment	Rec	f) overy riod	Meth Conve	od/	Depre	h) eciation uction	Elected	(i) section 17 cost
25	Special depreciation the tax year and us												25				
26	Property used more																
				%													
				%													
				%													
27	Property used 50%	or less in a qualifi	ed business	s use:													
				%								S/L -					
				%								S/L -					
				%								S/L -					
	Add amounts in col																
29	Add amounts in col	lumn (I), line 26. E													. 29		
	mplete this section for our employees, first ans		a sole prop	orietor, o see if	you mee	or c	other	"more tion to	than	5% oleting	owne	section f	or those	vehicles	s		
30	Total business/inve				(a) nicle 1	,	(b) Vehicl		V	(c) 'ehicle	3	(c Vehi	•		e) icle 5		(f) nicle 6
31	Total commuting m	=															
32		ersonal (nonco	٥,														
22	miles driven Total miles drive																
33	lines 30 through 32																
34	Was the vehicle			Yes	No	Υe	s	No	Yes	s	No	Yes	No	Yes	No	Yes	No
0-7	use during off-duty																
35	Was the vehicle																
	than 5% owner or r																
36	ls another vehicle	available for pers	onal use?														
	Sec	ction C - Questic	ns for Em	ploye	rs Who	o Pr	ovid	e Vel	nicles	s for	Use	by The	eir Em	ployee	es		
	swer these question re than 5% owners o				eption	to c	ompl	eting	Secti	ion B	for	vehicles	used	by em	ployees	who a	aren't
	Do you maintain a	a written policy s	tatement t	hat pr												Yes	No
	your employees?																
38	Do you maintain a					•									-		
20	employees? See th																
	Do you provide m																
40	Do you provide muse of the vehicles,		-								-		-				
41	Do you meet the re																
71	Note: If your answ	•	• .														
Pa	rt VI Amortizati		,	-,								. = •					
	(a)		(b) Date amor	tization	Δr	mortiz	(c)	mount		Cc	(d)	ction	(e Amortiz	zation	Amortiza	(f)	this veer

	(a) Description of costs	(b) Date amortization begins	(c) Amortizable amount	(d) Code section	(e) Amortization period or percentage	(f) Amortization for this year
42	Amortization of costs that begins duri	ng your 2022 tax	year (see instructions):			
43	Amortization of costs that began before	ore your 2022 tax y	year		43	
44	Total. Add amounts in column (f). Se	ee the instructions	for where to report		44	

Form 4562

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

2022

OMB No. 1545-0172

Attachment Sequence No. 179

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

ROBERT W. WOODRUFF ARTS CENTER,

Go to www.irs.gov/Form4562 for instructions and the latest information.

INC.

Identifying number 58-0633971

Business or activity to which this form relates PROPERTY 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. Maximum amount (see instructions) Total cost of section 179 property placed in service (see instructions) 2 Threshold cost of section 179 property before reduction in limitation (see instructions) 3 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions 6 (a) Description of property (b) Cost (business use only) Listed property. Enter the amount from line 29 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 Tentative deduction. Enter the **smaller** of line 5 or line 8 9 Carryover of disallowed deduction from line 13 of your 2021 Form 4562 10 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions 11 Carryover of disallowed deduction to 2023. 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 | Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions 15 Other depreciation (including ACRS) 16 51,295 Part | MACRS Depreciation (Don't include listed property. See instructions.) Section A If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here . Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (g) Depreciation deduction (e) Convention (a) Classification of property (business/investment use (f) Method placed in only - see instructions) service 19a 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property f 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MMS/L h Residential rental S/L 27.5 yrs. MM property 39 yrs. MMS/L i Nonresidential real ММ property Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System 20a Class life S/L **b** 12-year 12 yrs. S/I **c** 30-year 30 yrs MMS/L MM d 40-year 40 yrs. S/L Part IV Summary (See instructions.) Listed property. Enter amount from line 28 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter 51,295 For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs

Forn	n 4562 (2022)													58	-0633	971	Page
_	entertainme Note: For an	erty (Include au ent, recreation, or y vehicle for which	amusem you are us	ent.) sing the	e standa	ard r	nilea	ge rat	te or	dedu	cting	•	. ,			v 24a,	
		s (a) through (c) o													4 1. 9		
246	Section A - a Do you have evidence	Depreciation and			•											T .	37 N.
240	•		(c)	lent use	ciaimeu	<u> </u>	Yes	(e)	NO			es," is th				_ Yes	X No
	(a) Type of property (list vehicles first)	(b) Date placed in service	Business/ investment us percentage	se Cost	(d) or other b	asis	(busir	for depre ess/inve use only	stment	Rec	f) overy riod	Meth Conve	od/	Depre	h) eciation uction	Elected	(i) section 17 cost
25	Special depreciation the tax year and us												25				
26	Property used more																
				%													
				%													
				%													
27	Property used 50%	or less in a qualifi	ed business	s use:													
				%								S/L -					
				%								S/L -					
				%								S/L -					
	Add amounts in col																
29	Add amounts in col	lumn (I), line 26. E													. 29		
	mplete this section for our employees, first ans		a sole prop	orietor, o see if	you mee	or c	other	"more tion to	than	5% oleting	owne	section f	or those	vehicles	s		
30	Total business/inve				(a) nicle 1	,	(b) Vehicl		V	(c) 'ehicle	3	(c Vehi	•		e) icle 5		(f) nicle 6
31	Total commuting m	=															
32		ersonal (nonco	٥,														
22	miles driven Total miles drive																
33	lines 30 through 32																
34	Was the vehicle			Yes	No	Υe	s	No	Yes	s	No	Yes	No	Yes	No	Yes	No
0-7	use during off-duty																
35	Was the vehicle																
	than 5% owner or r																
36	ls another vehicle	available for pers	onal use?														
	Sec	ction C - Questic	ns for Em	ploye	rs Who	o Pr	ovid	e Vel	nicles	s for	Use	by The	eir Em	ployee	es		
	swer these question re than 5% owners o				eption	to c	ompl	eting	Secti	ion B	for	vehicles	used	by em	ployees	who a	aren't
	Do you maintain a	a written policy s	tatement t	hat pr												Yes	No
	your employees?																
38	Do you maintain a					•									-		
20	employees? See th																
	Do you provide m																
40	Do you provide muse of the vehicles,		-								-		-				
41	Do you meet the re																
71	Note: If your answ	•	• .														
Pa	rt VI Amortizati		,	-,								. = •					
	(a)		(b) Date amor	tization	Δr	mortiz	(c)	mount		Cc	(d)	ction	(e Amortiz	zation	Amortiza	(f)	this veer

	(a) Description of costs	(b) Date amortization begins	(c) Amortizable amount	(d) Code section	(e) Amortization period or percentage	(f) Amortization for this year
42	Amortization of costs that begins duri	ng your 2022 tax	year (see instructions):			
43	Amortization of costs that began before	ore your 2022 tax y	year		43	
44	Total. Add amounts in column (f). Se	ee the instructions	for where to report		44	

4562

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

OMB No. 1545-0172

Attachment Sequence No. 179

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

ROBERT W. WOODRUFF ARTS CENTER, INC.

Go to www.irs.gov/Form4562 for instructions and the latest information.

Identifying number 58-0633971

Business or activity to which this form relates PARKING LOTS AND GARAGES 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. Maximum amount (see instructions) Total cost of section 179 property placed in service (see instructions) 2 Threshold cost of section 179 property before reduction in limitation (see instructions) 3 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions 6 (a) Description of property (b) Cost (business use only) Listed property. Enter the amount from line 29 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 Tentative deduction. Enter the **smaller** of line 5 or line 8 9 Carryover of disallowed deduction from line 13 of your 2021 Form 4562 10 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions 11 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11 Carryover of disallowed deduction to 2023. 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 | Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions 15 Other depreciation (including ACRS) 16 7,806 Part | MACRS Depreciation (Don't include listed property. See instructions.) Section A If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here . Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (g) Depreciation deduction (a) Classification of property (business/investment use (e) Convention (f) Method placed in only - see instructions) service 19a 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property f 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MMS/L h Residential rental S/L 27.5 yrs. MM property 39 yrs. MMS/L i Nonresidential real ММ property Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System 20a Class life S/L **b** 12-year 12 yrs. S/I **c** 30-year 30 yrs MMS/L MM d 40-year 40 yrs. S/L Part IV Summary (See instructions.) Listed property. Enter amount from line 28 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter 7,806. For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs

Forn	n 4562 (2022)													58	-0633	971	Page
_	entertainme Note: For an	erty (Include au ent, recreation, or y vehicle for which	amusem you are us	ent.) sing the	e standa	ard r	nilea	ge rat	te or	dedu	cting	•	. ,			v 24a,	
		s (a) through (c) o													4 1. 9		
246	Section A - a Do you have evidence	Depreciation and			•											T .	37 N.
240	•		(c)	lent use	ciaimeu	<u> </u>	Yes	(e)	NO			es," is th				_ Yes	X No
	(a) Type of property (list vehicles first)	(b) Date placed in service	Business/ investment us percentage	se Cost	(d) or other b	asis	(busir	for depre ess/inve use only	stment	Rec	f) overy riod	Meth Conve	od/	Depre	h) eciation uction	Elected	(i) section 17 cost
25	Special depreciation the tax year and us												25				
26	Property used more																
				%													
				%													
				%													
27	Property used 50%	or less in a qualifi	ed business	s use:													
				%								S/L -					
				%								S/L -					
				%								S/L -					
	Add amounts in col																
29	Add amounts in col	lumn (I), line 26. E													. 29		
	mplete this section for our employees, first ans		a sole prop	orietor, o see if	you mee	or c	other	"more tion to	than	5% oleting	owne	section f	or those	vehicles	s		
30	Total business/inve				(a) nicle 1	,	(b) Vehicl		V	(c) 'ehicle	3	(c Vehi	•		e) icle 5		(f) nicle 6
31	Total commuting m	=															
32		ersonal (nonco	٥,														
22	miles driven Total miles drive																
33	lines 30 through 32																
34	Was the vehicle			Yes	No	Υe	s	No	Yes	s	No	Yes	No	Yes	No	Yes	No
0-7	use during off-duty																
35	Was the vehicle																
	than 5% owner or r																
36	ls another vehicle	available for pers	onal use?														
	Sec	ction C - Questic	ns for Em	ploye	rs Who	o Pr	ovid	e Vel	nicles	s for	Use	by The	eir Em	ployee	es		
	swer these question re than 5% owners o				eption	to c	ompl	eting	Secti	ion B	for	vehicles	used	by em	ployees	who a	aren't
	Do you maintain a	a written policy s	tatement t	hat pr												Yes	No
	your employees?																
38	Do you maintain a					•									-		
20	employees? See th																
	Do you provide m																
40	Do you provide muse of the vehicles,		-								-		-				
41	Do you meet the re																
71	Note: If your answ	•	• .														
Pa	rt VI Amortizati		,	-,								. = •					
	(a)		(b) Date amor	tization	Δr	mortiz	(c)	mount		Cc	(d)	ction	(e Amortiz	zation	Amortiza	(f)	this veer

	(a) Description of costs	(b) Date amortization begins	(c) Amortizable amount	(d) Code section	(e) Amortization period or percentage	(f) Amortization for this year
42	Amortization of costs that begins duri	ng your 2022 tax	year (see instructions):			
43	Amortization of costs that began before	ore your 2022 tax y	year		43	
44	Total. Add amounts in column (f). Se	ee the instructions	for where to report		44	

Form 4562

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

20**22**

OMB No. 1545-0172

Attachment Sequence No. 179

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

ROBERT W. WOODRUFF ARTS CENTER,

Go to www.irs.gov/Form4562 for instructions and the latest information.

INC.

Sequence No. 179
Identifying number 58-0633971

Business or activity to which this form relates GIFT SHOP 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. Maximum amount (see instructions) Total cost of section 179 property placed in service (see instructions) 2 Threshold cost of section 179 property before reduction in limitation (see instructions) 3 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions 6 (a) Description of property (b) Cost (business use only) Listed property. Enter the amount from line 29 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 Tentative deduction. Enter the **smaller** of line 5 or line 8 9 Carryover of disallowed deduction from line 13 of your 2021 Form 4562 10 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions 11 Carryover of disallowed deduction to 2023. 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 | Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions 15 Other depreciation (including ACRS) 16 20,796 Part | MACRS Depreciation (Don't include listed property. See instructions.) Section A If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here . Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (g) Depreciation deduction (e) Convention (a) Classification of property (business/investment use (f) Method placed in only - see instructions) service 19a 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property f 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MMS/L h Residential rental S/L 27.5 yrs. MM property 39 yrs. MMS/L i Nonresidential real ММ property Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System 20a Class life S/L **b** 12-year 12 yrs. S/I **c** 30-year 30 yrs MMS/L MM d 40-year 40 yrs. S/L Part IV Summary (See instructions.) Listed property. Enter amount from line 28 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter 20,796 For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs

Forn	n 4562 (2022)										58	-0633	971	Page
	rt V Listed Property (Include a			in othe	r vehic	les, ce	ertain	aircraft,	and pro	perty	used f	or		ı-aye
	entertainment, recreation, o						4		. 1				0.4	
	Note: For any vehicle for whice 24b, columns (a) through (c)	th you are us of Section A	sing the	e standa Section	ard mile B. and	eage ra Sectio	ate or on the contract of the	deducting ipplicable	lease ex	pense	, compl	lete onl y	/ 24a,	
	Section A - Depreciation and							• •		passe	nger au	ıtomobil	es.)	
24a	Do you have evidence to support the bu					es		24b If "\		•			Yes	N
	(a) (b)	(c)		(-1)		(e)		(f)	(g)		 (h)		(i)
	Type of property (list Date placed	Business/ investment us	se Cost	(d) or other b	:-	sis for dep Isiness/inv		Recovery	Meth			eciation	1	section 1
	vehicles first) in service	percentage				use onl		period	Conve	ntion	aea	uction	,	ost
25	Special depreciation allowance for													
	the tax year and used more than 50%				se. See	instruc	tions			25				
26	Property used more than 50% in a c	_		e:				I						
			%											
			%											
27	Property used 50% or less in a quali													
	Troporty used 50 % of 1656 in a quair		%						S/L -					
		_	%						S/L -				1	
			%						S/L -				1	
28	Add amounts in column (h), lines 25	through 27	. Enter	here ar	nd on lir	ne 21,	page 1			28			-	
	Add amounts in column (i), line 26.											. 29		
								hicles						
	nplete this section for vehicles used by												rovided	vehicl
о у	our employees, first answer the questions	in Section C to	see if y	ou mee	t an exce	eption to	comp	leting this	section fo	or those	e vehicle	·S.		
				a) icle 1		b) icle 2	\ \/	(c) ehicle 3	(d Vehic			(e) nicle 5		(f) nicle 6
30	Total business/investment miles driv		Ven	icie i	Ven	ICIC Z	"	erricle 5	Verno	,ic 4	Vei	ncie 5	V C1	iicie u
	the year (don't include commuting n													
31	Total commuting miles driven during													
32	Total other personal (nonce	• ,												
22	miles driven													
33	Total miles driven during the values 30 through 32													
3/1	Was the vehicle available for per		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
, ,	use during off-duty hours?				100			110					1	
35	Was the vehicle used primarily b													
	than 5% owner or related person?	-												
	,													
36	Is another vehicle available for per	sonal use?												
	Section C - Questi	ons for Em	ploye	rs Who	Provi	ide Ve	hicles	for Use	by The	ir Em	ploye	es		
٩ns	swer these questions to determine if	you meet	an exc	eption 1	to com	pleting	Secti	on B for	vehicles	used	by em	ployees	who a	ren't
	re than 5% owners or related persons												1	
37	Do you maintain a written policy		•		-					•			Yes	No
	your employees?													
38	Do you maintain a written policy		-		-				-		-			
	employees? See the instructions for		-	•										
	Do you treat all use of vehicles by er													
10	Do you provide more than five veruse of the vehicles, and retain the in													
11	Do you meet the requirements conc													
• 1	Note: If your answer to 37, 38, 39,													
Pa	rt VI Amortization	. 5, 51 71 15	. 55, (p.1010	200110	5 101		2.04 7011	. 5.00.				
		/h)								(e	e)			
	(a)	(b) Date amor	tization	۸,	(c)			(d)		Amorti	zation	Ati	(f)	سممدر منطر
	Description of costs	begin		An	nortizable	: arnount		Code se	ะบแบก	perio percei		Amortiz	ation for t	nıs year
2	Amortization of costs that begins du	ring your 20	22 tax	year (se	e instr	uctions):							
43	Amortization of costs that began be-	fore your 20	22 tax	year							43			

Form 4562

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

OMB No. 1545-0172
2022

Attachment Sequence No. 179

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

ROBERT W. WOODRUFF ARTS CENTER, INC.

Go to www.irs.gov/Form4562 for instructions and the latest information.

Sequence No. 179
Identifying number 58-0633971

Business or activity to which this form relates LESSOR OF NONRESIDENTIAL BUILDING 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. Maximum amount (see instructions) Total cost of section 179 property placed in service (see instructions) 2 Threshold cost of section 179 property before reduction in limitation (see instructions) 3 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions 6 (a) Description of property (b) Cost (business use only) Listed property. Enter the amount from line 29 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 Tentative deduction. Enter the **smaller** of line 5 or line 8 9 Carryover of disallowed deduction from line 13 of your 2021 Form 4562 10 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions 11 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11 Carryover of disallowed deduction to 2023. 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 | Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions 15 Other depreciation (including ACRS) 16 Part | MACRS Depreciation (Don't include listed property. See instructions.) Section A If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (g) Depreciation deduction (a) Classification of property (business/investment use (e) Convention (f) Method placed in only - see instructions) service 19a 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property f 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MMS/L h Residential rental S/L 27.5 yrs. MM property 39 yrs. MMS/L i Nonresidential real ММ property Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System 20a Class life **b** 12-year 12 yrs. S/I **c** 30-year 30 yrs MMS/L MM d 40-year 40 yrs. S/L Part IV Summary (See instructions.) Listed property. Enter amount from line 28 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs

Forn	n 4562 (2022)										58	-0633	971	Page
	rt V Listed Property (Include a			in othe	r vehic	les, ce	ertain	aircraft,	and pro	perty	used f	or		ı-aye
	entertainment, recreation, o						4		. 1				0.4	
	Note: For any vehicle for whice 24b, columns (a) through (c)	th you are us of Section A	sing the	e standa Section	ard mile B. and	eage ra Sectio	ate or on the contract of the	deducting ipplicable	lease ex	pense	, compl	lete onl y	/ 24a,	
	Section A - Depreciation and							• •		passe	nger au	ıtomobil	es.)	
24a	Do you have evidence to support the bu					es		24b If "\		•			Yes	N
	(a) (b)	(c)		(-1)		(e)		(f)	(g)		 (h)		(i)
	Type of property (list Date placed	Business/ investment us	se Cost	(d) or other b	:-	sis for dep Isiness/inv		Recovery	Meth			eciation	1	section 1
	vehicles first) in service	percentage				use onl		period	Conve	ntion	aea	uction	,	ost
25	Special depreciation allowance for													
	the tax year and used more than 50%				se. See	instruc	tions			25				
26	Property used more than 50% in a c	_		e:				I						
			%											
			%											
27	Property used 50% or less in a quali													
	Troporty used 50 % of 1656 in a quair		%						S/L -					
		_	%						S/L -				1	
			%						S/L -				1	
28	Add amounts in column (h), lines 25	through 27	. Enter	here ar	nd on lir	ne 21,	page 1			28			-	
	Add amounts in column (i), line 26.											. 29		
								hicles						
	nplete this section for vehicles used by												rovided	vehicl
о у	our employees, first answer the questions	in Section C to	see if y	ou mee	t an exce	eption to	comp	leting this	section fo	or those	e vehicle	·S.		
				a) icle 1		b) icle 2	\ \ _{\\\}	(c) ehicle 3	(d Vehic			(e) nicle 5		(f) nicle 6
30	Total business/investment miles driv		Ven	icie i	Ven	ICIC Z	"	erricle 5	Verno	,ic 4	Vei	ncie 5	V C1	iicie u
	the year (don't include commuting n													
31	Total commuting miles driven during													
32	Total other personal (nonce	• ,												
22	miles driven													
33	Total miles driven during the values 30 through 32													
3/1	Was the vehicle available for per		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
, ,	use during off-duty hours?				100			110					1	
35	Was the vehicle used primarily b													
	than 5% owner or related person?	-												
	,													
36	Is another vehicle available for per	sonal use?												
	Section C - Questi	ons for Em	ploye	rs Who	Provi	ide Ve	hicles	for Use	by The	ir Em	ploye	es		
٩ns	swer these questions to determine if	you meet	an exc	eption 1	to com	pleting	Secti	on B for	vehicles	used	by em	ployees	who a	ren't
	re than 5% owners or related persons												1	
37	Do you maintain a written policy		•		-					•			Yes	No
	your employees?													
38	Do you maintain a written policy		-		-				-		-			
	employees? See the instructions for		-	•										
	Do you treat all use of vehicles by er													
10	Do you provide more than five veruse of the vehicles, and retain the in													
11	Do you meet the requirements conc													
• 1	Note: If your answer to 37, 38, 39,													
Pa	rt VI Amortization	. 5, 51 71 15	. 55, (p.1010	200110	5 101		2.04 7011	. 5.00.				
		/h)								(e	e)			
	(a)	(b) Date amor	tization	۸,	(c)			(d)		Amorti	zation	Ati	(f)	سممدر منطر
	Description of costs	begin		An	nortizable	: arnount		Code se	ะบแบก	perio percei		Amortiz	ation for t	nıs year
2	Amortization of costs that begins du	ring your 20	22 tax	year (se	e instr	uctions):							
43	Amortization of costs that began be-	fore your 20	22 tax	year							43			

Form **4562**

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

OMB No. 1545-0172

Attachment Sequence No. 179

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

ROBERT W. WOODRUFF ARTS CENTER, INC.

Go to www.irs.gov/Form4562 for instructions and the latest information.

Identifying number 58-0633971

Busi	ness or activity to which this form relates									
E	VENTS AND CATERING									
Pa	rt I Election To Expense Co	ertain Property (Jnder Sect	ion 179						
	Note: If you have any lis	ted property, con	nplete Part	V before	you comp	lete Part I.				
1	Maximum amount (see instructions)						1			
2	Total cost of section 179 property pla	iced in service (see in	structions)				2			
3	Threshold cost of section 179 proper	ty before reduction in	n limitation (se	e instructior	ns)		3			
4 5	Reduction in limitation. Subtract line Dollar limitation for tax year. Subseparately, see instructions	3 from line 2. If zero o tract line 4 from	r less, enter -0 line 1. If)- zero or le	ess, enter -) If married	filing 5			
6	(a) Description				siness use only					
	, ,			, ,		, , ,				
7	Listed property. Enter the amount from	m line 29			7					
8	Total elected cost of section 179 prop	perty. Add amounts i	n column (c). I	ines 6 and	7		8			
	Tentative deduction. Enter the smaller									
10	Carryover of disallowed deduction from	om line 13 of your 20	21 Form 4562				10			
11	Business income limitation. Enter the									
12	Section 179 expense deduction. Add	lines 9 and 10, but of	don't enter mo	ore than line	:11		12			
	Carryover of disallowed deduction to									
	e: Don't use Part II or Part III below for					•				
Pa	rt II Special Depreciation A	llowance and Ot	her Deprec	iation (D	on't include	listed propert	y. See inst	ructions.)		
14	Special depreciation allowance for	or qualified proper	rty (other tl	han listed	property)	placed in se	ervice			
	during the tax year. See instructions						14			
15	Property subject to section 168(f)(1) election									
16	6 Other depreciation (including ACRS) 16 83,539									
Pa	Part III MACRS Depreciation (Don't include listed property. See instructions.)									
			Sect	tion A						
17	MACRS deductions for assets placed	I in service in tax yea	rs beginning b	efore 2022			17			
18	18 If you are electing to group any assets placed in service during the tax year into one or more general									
	asset accounts, check here									
	Section B - Assets					General Dep	reciation Sy	/stem		
	(a) Classification of property	(b) Month and year placed in service	(c) Basis for (business/inversed in only - see in	estment use	(d) Recovery period	(e) Convention	(f) Method	(g) Depreciation deduction		
19a	3-year property									
b	5-year property									
С	7-year property									
d	I 10-year property									
е	15-year property									
f	20-year property									
g	25-year property				25 yrs.		S/L			
h	Residential rental				27.5 yrs.	MM	S/L			
	property				27.5 yrs.	MM	S/L			
i	Nonresidential real				39 yrs.	MM	S/L			
	property					MM	S/L	•		
	Section C - Assets P	laced in Service D	uring 2022	lax Year	Using the A	Alternative De		System		
	Class life				40		S/L			
	12-year				12 yrs.	B 4 B 4	S/L			
	: 30-year				30 yrs.	MM	S/L			
	40-year	l one \			40 yrs.	MM	S/L			
	rt IV Summary (See instruction									
	Listed property. Enter amount from lin						21			
22	Total. Add amounts from line 12,	-			,			00 500		
23	here and on the appropriate lines of your For assets shown above and place portion of the basis attributable to see	ed in service during	ps and Scorp g the curren	บเลแบกร-ร tyear, ent	ter the		22	83,539		
	portion of the basis attributable to se	ction 263A costs			23					

Forn	n 4562 (2022)										58	-0633	971	Page
	rt V Listed Property (Include a			in othe	r vehic	les, ce	ertain	aircraft,	and pro	perty	used f	or		ı-aye
	entertainment, recreation, o						4		. 1				0.4	
	Note: For any vehicle for whice 24b, columns (a) through (c)	th you are us of Section A	sing the	e standa Section	ard mile B. and	eage ra Sectio	ate or on the contract of the	deducting ipplicable	lease ex	pense	, compl	lete onl y	/ 24a,	
	Section A - Depreciation and							• •		passe	nger au	ıtomobil	es.)	
24a	Do you have evidence to support the bu					es		24b If "\		•			Yes	N
	(a) (b)	(c)		(-1)		(e)		(f)	(g)		 (h)		(i)
	Type of property (list Date placed	Business/ investment us	se Cost	(d) or other b	:-	sis for dep Isiness/inv		Recovery	Meth			eciation	1	section 1
	vehicles first) in service	percentage				use onl		period	Conve	ntion	aea	uction	,	ost
25	Special depreciation allowance for													
	the tax year and used more than 50%				se. See	instruc	tions			25				
26	Property used more than 50% in a c	_		e:				I						
			%											
			%											
27	Property used 50% or less in a quali													
	Troporty used 50 % of 1656 in a quair		%						S/L -					
		_	%						S/L -				1	
			%						S/L -				1	
28	Add amounts in column (h), lines 25	through 27	. Enter	here ar	nd on lir	ne 21,	page 1			28			-	
	Add amounts in column (i), line 26.											. 29		
								hicles						
	nplete this section for vehicles used by												rovided	vehicl
о у	our employees, first answer the questions	in Section C to	see if y	ou mee	t an exce	eption to	comp	leting this	section fo	or those	e vehicle	·S.		
				a) icle 1		b) icle 2	\ \/	(c) ehicle 3	(d Vehic			(e) nicle 5		(f) nicle 6
30	Total business/investment miles driv		Ven	icie i	Ven	ICIC Z	"	erricle 5	Verno	,ic 4	Vei	ncie 5	V C1	iicie u
	the year (don't include commuting n													
31	Total commuting miles driven during													
32	Total other personal (nonce	• ,												
22	miles driven													
33	Total miles driven during the values 30 through 32													
3/1	Was the vehicle available for per		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
, ,	use during off-duty hours?				100			110					1	
35	Was the vehicle used primarily b													
	than 5% owner or related person?	-												
	,													
36	Is another vehicle available for per	sonal use?												
	Section C - Questi	ons for Em	ploye	rs Who	Provi	ide Ve	hicles	for Use	by The	ir Em	ploye	es		
٩ns	swer these questions to determine if	you meet	an exc	eption 1	to com	pleting	Secti	on B for	vehicles	used	by em	ployees	who a	ren't
	re than 5% owners or related persons												1	
37	Do you maintain a written policy		•		-					•			Yes	No
	your employees?													
38	Do you maintain a written policy		-		-				-		-			
	employees? See the instructions for		-	•										
	Do you treat all use of vehicles by er													
10	Do you provide more than five veruse of the vehicles, and retain the in													
11	Do you meet the requirements conc													
• 1	Note: If your answer to 37, 38, 39,													
Pa	rt VI Amortization	. 5, 51 71 15	. 55, (p.1010	200110	5 101		2.04 7011	. 5.00.				
		/h)								(e	e)			
	(a)	(b) Date amor	tization	۸,	(c)			(d)		Amorti	zation	Ati	(f)	سممدر منطر
	Description of costs	begin		An	nortizable	: arnount		Code se	ะบแบก	perio percei		Amortiz	ation for t	nıs year
2	Amortization of costs that begins du	ring your 20	22 tax	year (se	e instr	uctions):							
43	Amortization of costs that began be-	fore your 20	22 tax	year							43			

Form **4562**

Depreciation and Amortization

(Including Information on Listed Property)

Attach to your tax return.

20**22**

OMB No. 1545-0172

Attachment Sequence No. 179

58-0633971

Identifying number

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

ROBERT W. WOODRUFF ARTS CENTER,

Go to www.irs.gov/Form4562 for instructions and the latest information.

INC.

Business or activity to which this form relates 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. Maximum amount (see instructions) Total cost of section 179 property placed in service (see instructions) 2 Threshold cost of section 179 property before reduction in limitation (see instructions) 3 Reduction in limitation. Subtract line 3 from line 2. If zero or less, enter -0-4 Dollar limitation for tax year. Subtract line 4 from line 1. If zero or less, enter -0-. If married filing separately, see instructions 6 (a) Description of property (b) Cost (business use only) Listed property. Enter the amount from line 29 Total elected cost of section 179 property. Add amounts in column (c), lines 6 and 7 Tentative deduction. Enter the **smaller** of line 5 or line 8 9 Carryover of disallowed deduction from line 13 of your 2021 Form 4562 10 10 11 Business income limitation. Enter the smaller of business income (not less than zero) or line 5. See instructions 11 Section 179 expense deduction. Add lines 9 and 10, but don't enter more than line 11 Carryover of disallowed deduction to 2023. 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 | Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.) Special depreciation allowance for qualified property (other than listed property) placed in service during the tax year. See instructions 15 Other depreciation (including ACRS) 16 Part | MACRS Depreciation (Don't include listed property. See instructions.) Section A If you are electing to group any assets placed in service during the tax year into one or more general asset accounts, check here Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System (b) Month and year (c) Basis for depreciation (d) Recovery (g) Depreciation deduction (a) Classification of property (business/investment use (e) Convention (f) Method placed in only - see instructions) service 19a 3-year property **b** 5-year property c 7-year property d 10-year property e 15-year property f 20-year property 25 yrs. S/L g 25-year property 27.5 yrs. MMS/L h Residential rental S/L 27.5 yrs. MM property 39 yrs. MMS/L i Nonresidential real ММ property Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System 20a Class life **b** 12-year 12 yrs. S/I **c** 30-year 30 yrs MMS/L MM d 40-year 40 yrs. S/L Part IV Summary (See instructions.) Listed property. Enter amount from line 28 Total. Add amounts from line 12, lines 14 through 17, lines 19 and 20 in column (g), and line 21. Enter

For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs

Forn	n 4562 (2022)										58	-0633	971	Page
	rt V Listed Property (Include a			in othe	r vehic	les, ce	ertain	aircraft,	and pro	perty	used f	or		ı-aye
	entertainment, recreation, o						4		. 1				0.4	
	Note: For any vehicle for whice 24b, columns (a) through (c)	th you are us of Section A	sing the	e standa Section	ard mile B. and	eage ra Sectio	ate or on the contract of the	deducting ipplicable	lease ex	pense	, compl	lete onl y	/ 24a,	
	Section A - Depreciation and							• •		passe	nger au	ıtomobil	es.)	
24a	Do you have evidence to support the bu					es		24b If "\		•			Yes	N
	(a) (b)	(c)		(-1)		(e)		(f)	(g)		 (h)		(i)
	Type of property (list Date placed	Business/ investment us	se Cost	(d) or other b	:-	sis for dep Isiness/inv		Recovery	Meth			eciation	1	section 1
	vehicles first) in service	percentage				use onl		period	Conve	ntion	aea	uction	,	ost
25	Special depreciation allowance for													
	the tax year and used more than 50%				se. See	instruc	tions			25				
26	Property used more than 50% in a c	_		e:				I						
			%											
			%											
27	Property used 50% or less in a quali													
	Troporty used 50 % of 1656 in a quair		%						S/L -					
		_	%						S/L -				1	
			%						S/L -				1	
28	Add amounts in column (h), lines 25	through 27	. Enter	here ar	nd on lir	ne 21,	page 1			28			-	
	Add amounts in column (i), line 26.											. 29		
								hicles						
	nplete this section for vehicles used by												rovided	vehicl
о у	our employees, first answer the questions	in Section C to	see if y	ou mee	t an exce	eption to	comp	leting this	section fo	or those	e vehicle	·S.		
				a) icle 1		b) icle 2	\ \ _{\\\}	(c) ehicle 3	(d Vehic			(e) nicle 5		(f) nicle 6
30	Total business/investment miles driv		Ven	icie i	Ven	ICIC Z	"	erricle 5	Verno	,ic 4	Vei	ncie 5	V C1	iicie u
	the year (don't include commuting n													
31	Total commuting miles driven during													
32	Total other personal (nonce	• ,												
22	miles driven													
33	Total miles driven during the values 30 through 32													
3/1	Was the vehicle available for per		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
, ,	use during off-duty hours?				100			110					1	
35	Was the vehicle used primarily b													
	than 5% owner or related person?	-												
	,													
36	Is another vehicle available for per	sonal use?												
	Section C - Questi	ons for Em	ploye	rs Who	Provi	ide Ve	hicles	for Use	by The	ir Em	ploye	es		
٩ns	swer these questions to determine if	you meet	an exc	eption 1	to com	pleting	Secti	on B for	vehicles	used	by em	ployees	who a	ren't
	re than 5% owners or related persons												1	
37	Do you maintain a written policy		•		-					•			Yes	No
	your employees?													
38	Do you maintain a written policy		-		-				-		-			
	employees? See the instructions for		-	•										
	Do you treat all use of vehicles by er													
10	Do you provide more than five veruse of the vehicles, and retain the in													
11	Do you meet the requirements conc													
• 1	Note: If your answer to 37, 38, 39,													
Pa	rt VI Amortization	. 5, 51 71 15	. 55, (p.1010	200110	5 101		2.04 7011	. 5.00.				
		/h)								(e	e)			
	(a)	(b) Date amor	tization	۸,	(c)			(d)		Amorti	zation	Ati	(f)	سممدر منطر
	Description of costs	begin		An	nortizable	: arnount		Code se	ะบแบก	perio percei		Amortiz	ation for t	nıs year
2	Amortization of costs that begins du	ring your 20	22 tax	year (se	e instr	uctions):							
43	Amortization of costs that began be-	fore your 20	22 tax	year							43			

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**

IIS I	of transferor		Identifying nymbor /	in atm : ati						
		Identifying number (see instructions)								
	BERT W. WOODRUFF ARTS CENTER, INC.		58-063397							
1	Is the transferee a specified 10%-owned foreign corporation that		orporation?	_ Yes	X No					
2	If the transferor was a corporation, complete questions 2a through		000(-))							
а	If the transfer was a section 361(a) or (b) transfer, was the transfer as a few and few and the comment as 2	· ·	· · · ·		□ Na					
	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 num	per(s).								
	Controlling shareholder	Identifying number								
С	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t			Yes	☐ No					
	Name of parent corporation	EIN of p	arent corporation	า						
	Llove having division and a wader a setime 207/s)/// have made 2			V						
a	Have basis adjustments under section 367(a)(4) been made?		∟	_ Yes	∟ No					
	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ction 367),					
	Name of partnership	EIN	of partnership							
LAK	ESTAR GROWTH I, LP	98-	1473489							
	Did the partner pick up its pro rata share of gain on the transfer of			Yes	X No					
С	Is the partner disposing of its $\mbox{\bf entire}$ interest in the partnership? \Box		L	Yes	X No					
	Is the partner disposing of an interest in a limited partnership securities market?			Yes	X No					
Par		structions)								
4	Name of transferee (foreign corporation)		5a Identifying n	umber, if	any					
	ALAN SA		FOREI							
6	Address (including country) 117 QUAL DE VALMY		5b Reference ID (see instructions							
7	PARIS FR 75010 Country code of country of incorporation or organization (see ins	tructions)								
7	, , , , , , , , , , , , , , , , , , , ,	ni dollono)								
8	FR Foreign law characterization (see instructions)									
J	,									
9	CORPORATION Is the transferee foreign corporation a controlled foreign corpora	tion?		Yes	X No					
	is the transferred foreign desperation a controlled foreign corpora			1 62						

Part III Infor	mation Regarding	Transfer of Property (see instru	ctions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," sl	the only property trans	art III and go to Part IV.				Yes X No
	er Property (otner	than intangible prope	erty subje	ct to section 36	(d)	(e)
Type of property	Date of Description of Fair market value on Cost or other					Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEMEN	T 1				
Other property (not listed under another category)						
Property with built-in loss						
built-iii 1033						
 Totals						
foreign con If "Yes," go b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the tr 13 Did the tra	poration? to to line 12b. ansferor a domestic of a branch that is a foreign time 12c. If "ely after the transfer, foreign corporation? ontinue to line 12d. If "ransferred loss amou	corporation that transferrign disregarded entity) to No," skip lines 12c and was the domestic control skip line 12d, and interior included in gross incontrol described in section stions 14a through 15.	red substant a specified 12d, and groot ation 2go to line 13 me as req	ntially all of the a d 10%-owned for o to line 13. a U.S. sharehol 	assets of a foreign but reign corporation?	Yes X No
Section C - Inta	ingible Property Su	bject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
.,.,						
Totals						

b c d	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes Yes Yes	No No No
Supp	Diemental Part III Information Required To Be Reported (see instructions)		
	·		
	ALEC III C. D. P. T. (D. () I C.)		
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 0.00000 % (b) After 0.00061 %		
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.		77
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d		Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a		Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С			
	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did the domestic corporation not recognize gain or loss on the distribution of property because the	Yes	X No

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					
Name	of transferor	Identifying number (see instructions)			
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		<u>58-063397</u>	1	
1	Is the transferee a specified 10%-owned foreign corporation that	is not a controlled foreign co	orporation?	Yes	X No
2	If the transferor was a corporation, complete questions 2a through	gh 2d.			
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	n 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 numl				
	Controlling shareholder	Ident	ifying number		
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of the corporation to the	he parent corporation.	arent corporation	Yes	□ No
d	Have basis adjustments under section 367(a)(4) been made?			Yes	∟ No
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such t	ınder se	ction 367),
	Name of partnership	EIN (of partnership		
	·				
LAK	KESTAR GROWTH I, LP	98-	1473489		
	Did the newtwee niet up its are rete share of gain on the transfer of	f northerabin acceta?		Yes	37 11.
	Did the partner pick up its pro rata share of gain on the transfer o			†	X No
	Is the partner disposing of its entire interest in the partnership?			Yes	X No
a	Is the partner disposing of an interest in a limited partnership t] v	X No
Do	securities market?	tructions)		Yes	X
Par		structions)	E. H. etc.		
4	Name of transferee (foreign corporation)		5a Identifying nu		any
	EIGEN TECH		FOREI		
6	Address (including country)		5b Reference ID (see instructions		
	86 FETTER LANE		(3CC III3ti dotiolis	,	
	LONDON UK EC4A 1EN	4			
7	Country code of country of incorporation or organization (see ins	tructions)			
	UK				
8	Foreign law characterization (see instructions)				
	CORPORATION				
9	Is the transferee foreign corporation a controlled foreign corporat	tion?		Yes	X No

Part III Infor	mation Regardin	g Transfer of Property	(see instru	ctions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	04/26/2022	2		4,579.		
lf "Yes," sk		Part III and go to Part IV.	outs, out io		007(4))	X Yes No
	er Property (oth	er than intangible prop	erty subje	(c) Section 3	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Duiit-iii 1055						
 Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	poration? to to line 12b. ansferor a domestical branch that is a footninue to line 12c. Ity after the transforeign corporation on tinue to line 12d. ransferred loss amusferor transfer pro-	branch (including a branch comporation that transfer oreign disregarded entity) the strength of the strength o	rred substar o a specified 12d, and grorporation a 	ntially all of the d 10%-owned for to line 13. a U.S. shareho	assets of a foreign boreign corporation?	ranch
Section C - Inta	ngible Property	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pric on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No
c 21	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 Yes	X No

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OMB No. 1545-0026

Name of transferor	1	Identifying number (se		
				ons)
ROBERT W. WOODRUFF ARTS CENTER, INC.		58-063397		X No
1 Is the transferee a specified 10%-owned foreign corporation that2 If the transferor was a corporation, complete questions 2a through		orporation?	Yes	LA NO
2 If the transferor was a corporation, complete questions 2a throug a If the transfer was a section 361(a) or (b) transfer, was the trans	=	n 369(a)) 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 num			162	NO
if flot, list the controlling shareholder(s) and their identifying fluin	per(s).			
Controlling shareholder	Ident	ifying number		
c If the transferor was a member of an affiliated group filing corporation? If not, list the name and employer identification number (EIN) of t			Yes	☐ No
Name of parent corporation	EIN OF P	arent 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 a complete questions 3a through 3d.a List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such u	ınder se	ction 367),
Name of partnership	EIN	of partnership		
LAKESTAR III, LP		1473139		
			1	
b Did the partner pick up its pro rata share of gain on the transfer of			Yes	X No
c Is the partner disposing of its entire interest in the partnership?			Yes	X No
d Is the partner disposing of an interest in a limited partnership] v	TZ No
securities market? Part II Transferee Foreign Corporation Information (see ins	tructions)		Yes	X No
Part I Transferee Foreign Corporation Information (see ins 4 Name of transferee (foreign corporation)	structions)	5a Identifying nu	mber if	anv
				ally
BELLMAN SAS 6 Address (including country)		FOREIO 5b Reference ID		
34 AVENUE DES CHAMPS-ELYSEES		(see instructions)		
PARIS FR 75008		,		
7 Country code of country of incorporation or organization (see ins	structions)			
FR	,			
8 Foreign law characterization (see instructions)				
CORPORATION				
9 Is the transferee foreign corporation a controlled foreign corpora	tion?		Yes	X No

		Transfer of Property	(see instru	ctions)		
Section A - Cas		4.			7.0	
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
lf "Yes," sk		Part III and go to Part IV.				Yes 🗓 No
Section B - Oth	er Property (othe	er than intangible prop	erty subjec	ct to section 3	(d)	(0)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEME	NT 2				
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign cor If "Yes," go b Was the tr (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	poration? to to line 12b. ansferor a domestic a branch that is a for- ontinue to line 12c. If ly after the transfe foreign corporation? ontinue to line 12d. If ransferred loss amo nsferor transfer prop	d? ranch (including a branch corporation that transfereign disregarded entity) to "No," skip lines 12c and r, was the domestic confirmation of "No," skip line 12d, and untincluded in gross incorporation destions 14a through 15.	rred substar to a specified I 12d, and go orporation a go to line 13 ome as requ	ntially all of the d 10%-owned fo o to line 13. a U.S. shareho dired under sect	assets of a foreign boreign corporation?	Yes X No
Section C - Inta	ngible Property S	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pric on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
			+ -			
 Totals						

b c d	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	es No No No No No
Supp	plemental Part III Information Required To Be Reported (see instructions)	
Part	Additional Information Regarding Transfer of Property (see instructions)	
ıaıt	Additional information regarding frameror of Froporty (ede included included in	
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.	
	(a) Before 0.07512 % (b) After 0.07512 %	
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		es X No
b		es X No
C		es X No
d		es X No
19		es X No
20 a		es X No
_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) \$\bigs\\$	
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
C		es X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	22 140
41	·	es X No
	Covered by Scotlon Cov (C)(1): Oce instructions	C3 Z1 110

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OMB No. 1545-0026

Par					
Name	of transferor	Identifying number (see instructions)			
_RO	BERT W. WOODRUFF ARTS CENTER, INC.		<u>58-063397</u>	1	
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation?	Yes	X No
2	If the transferor was a corporation, complete questions 2a through	gh 2d.			
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under sectio	on 368(c)) by		
	five or fewer domestic corporations?			Yes	No
	Did the transferor remain in existence after the transfer?			Yes	☐ No
	If not, list the controlling shareholder(s) and their identifying numl				
	Controlling shareholder	Ident	ifying number		
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of to the Name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No
3	If the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such u	ınder se	ction 367),
	complete questions 3a through 3d.				
а	List the name and EIN of the transferor's partnership.				
	Name of partnership	FIN	of partnership		
	·				
LAK	XESTAR III, LP	98	1473139		
	Did the neutron riels up its mys rate share of gain on the transfer of	f nautnavahin assats?		Yes	37 11.
	Did the partner pick up its pro rata share of gain on the transfer of			t	X No
	Is the partner disposing of its entire interest in the partnership?			Yes	X No
	Is the partner disposing of an interest in a limited partnership			.	77
	securities market?			Yes	X No
Par		structions)	E. H. W. L.		
4	Name of transferee (foreign corporation)		5a Identifying nu		any
	DAREWISE ENTERTAINMENT		FOREI(
6	Address (including country)		5b Reference ID		
	27 RUE DE MOGADOR		(see instructions)	1	
	PARIS FR 75009				
7	Country code of country of incorporation or organization (see ins	tructions)			
	FR				
8	Foreign law characterization (see instructions)				
	CORPORATION				
9	Is the transferee foreign corporation a controlled foreign corporation	tion?		Yes	X No

		ransfer of Property (s	see instruc	tions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," sk	the only property transfe	t III and go to Part IV.				Yes X No
Section B - Oth		han intangible proper	rty subjec		<u> </u>	(a)
Type of property	(a) Date of transfer	Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEMENT	3				
Other property (not listed under another category)						
Property with						
built-in loss						
 Totals						
foreign cor If "Yes," go b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the tr 13 Did the tra	poration? to to line 12b. ansferor a domestic co a branch that is a foreigontinue to line 12c. If "N ly after the transfer, foreign corporation? ontinue to line 12d. If "N ransferred loss amount	rporation that transferrent disregarded entity) to lo," skip lines 12c and 1 was the domestic corporation, skip line 12d, and good included in gross inconty described in section 3 ons 14a through 15.	ed substant a specified 2d, and go poration a o to line 13. ne as requ	tially all of the a 10%-owned for to line 13. U.S. sharehol	essets of a foreign be reign corporation?	Yes X No
Section C - Inta	ngible Property Suk	ject to Section 367(d	1)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
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 0.05830 % (b) After 0.07049 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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Fell	of transferor		I.I	/t			
				Identifying number (see instructions)			
	BERT W. WOODRUFF ARTS CENTER, INC.		58-06339		37	—	
1	Is the transferee a specified 10%-owned foreign corporation that		orporation?	Yes	X N	0	
	If the transferor was a corporation, complete questions 2a through the transfer was a costion 361(a) or (b) transfer was the transfer.		n 260(a)) hu				
	If the transfer was a section 361(a) or (b) transfer, was the transfine or former demonstrates accordance.			Yes	□ N	_	
	five or fewer domestic corporations? Did the transferor remain in existence after the transfer?			Yes	N		
b	If not, list the controlling shareholder(s) and their identifying num			163	IN	U	
	if not, list the controlling shareholder(s) and their identifying hum	per(s).					
	Controlling shareholder	Iden	ifying number				
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of the state of the corporation of the corpo		. г	Yes	N	0	
	Name of parent corporation	·	arent corporation	. n			
	Name of parent corporation	Line of p	arent corporatio				
d	Have basis adjustments under section 367(a)(4) been made?			Yes	No.	<u> </u>	
	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection 36	37),	
	Name of partnership	EIN	of partnership				
LAK	ESTAR III, LP	98-	1473139				
	Did the partner pick up its pro rata share of gain on the transfer of			Yes	X N		
	Is the partner disposing of its entire interest in the partnership?		L	Yes	X N	0	
	Is the partner disposing of an interest in a limited partnership securities market?			Yes	X N	<u>o</u>	
Part		tructions)					
4	Name of transferee (foreign corporation)		5a Identifying	number, if	any		
	DASHDASH GMBH			IGNUS			
6	Address (including country)		5b Reference II (see instruction				
	AM MARCHENBRUNNEN 5		(see ilistruction	13 <i>)</i>			
	BERLIN GM 10407 Country code of country of incorporation or organization (see ins	tructions)					
7		ou uouons)					
8	GM Foreign law characterization (see instructions)						
U	CORPORATION						
9	Is the transferee foreign corporation a controlled foreign corporation	tion?		Yes	X N		
	<u> </u>			_			

		Transfer of Property ((see instrud	ctions)		
Section A - Cas		/b\		(a)	(4)	(0)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," s	•	art III and go to Part IV.				Yes X No
Section B - Oth		than intangible prope	erty subjec		<u> </u>	
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEMEN	NT 4				
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign collif "Yes," g b Was the tr (including If "Yes," collif c Immediate transferee If "Yes," collif d Enter the tr 13 Did the tra	rporation? o to line 12b. ransferor a domestic of a branch that is a fore continue to line 12c. If the ly after the transfer foreign corporation? ontinue to line 12d. If transferred loss amounts	corporation that transfer sign disregarded entity) to "No," skip lines 12c and, was the domestic comunity with the composition of the composition	red substan o a specified 12d, and go orporation a go to line 13 ome as requ	tially all of the a d 10%-owned for to line 13. d U.S. sharehold	ssets of a foreign begin corporation? der with respect to the second of	ranch Yes No
Section C - Inta	angible Property S	ubject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described					1	
in sec. 367(d)(4)					+	
					+	
Totals						

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?	Yes Yes Yes	No No No
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.		
47	(a) Before 0.08912 % (b) After 0.08130 %		
17 18	Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
a b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19 19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
			X No

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OMB No. 1545-0026

Par					
Name	of transferor	Identifying number (see instructions)			
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-063397	1	
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation?	Yes	X No
2	If the transferor was a corporation, complete questions 2a through	gh 2d.			
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 num			_	
	The first the centrolling chareful do (c) and their lacitarying ham	561(0).			
	Controlling shareholder	Ident	ifying number		
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t Name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No
				_	
3	If the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such t	under se	ction 367)
	complete questions 3a through 3d.				
а	List the name and EIN of the transferor's partnership.				
	Name of partnership	EIN	of partnership		
LAK	XESTAR III, LP	98-	1473139		
	Did the partner pick up its pro rata share of gain on the transfer of	f partnership coasts?		Yes	X No
	Is the partner disposing of its entire interest in the partnership?			+	
				Yes	X No
d	Is the partner disposing of an interest in a limited partnership] v	77 1
_	securities market?			Yes	X No
Par		structions)			
4	Name of transferee (foreign corporation)		5a Identifying nu		any
	HALO PCC LIMITED		FOREI		
6	Address (including country)		5b Reference ID		
	EAST WING, TRAFALGAR COURT		(see instructions)	
	LES BANQUES ST PETER PORT GK GY1 3PP				
7	Country code of country of incorporation or organization (see ins	tructions)			
	GK				
8	Foreign law characterization (see instructions)				
	CORPORATION				
9	Is the transferee foreign corporation a controlled foreign corpora	tion?		Yes	X No
	5			<u>,</u>	

		g Transfer of Property	y (see instru	ictions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," sl	kip the remainder of	ansferred? Part III and go to Part IV.				Yes X No
	er Property (oth	er than intangible pro	perty subje	(c)	367(d)) (d)	(e)
Type of property	Date of transfer	Description of property		narket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEM	ENT 5				
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign con foreign for foreign foreign for foreign foreign for foreign foreign for foreign foreign for foreign foreign for foreign foreign for foreign foreign for foreign for foreign for foreign for foreign for foreign foreign for foreign foreign for foreign foreign for foreign for foreign for foreign foreign for foreign foreign for foreign foreign for foreign for foreign for foreign for foreign for foreign foreign for foreign foreign for foreign foreign foreign for foreign for foreign foreign foreign foreign for foreign foreign for foreign foreig	assets of a foreign lappropriation? To to line 12b. Tansferor a domestical branch that is a footntinue to line 12c. Ty after the transferoreign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	branch (including a branch corporation that transforeign disregarded entity) If "No," skip lines 12c arer, was the domestic? If "No," skip line 12d, and ount included in gross in operty described in sections 14a through 15.	erred substa of to a specified of 12d, and go corporation ond go to line 1stoome as req	oreign disregal ntially all of the d 10%-owned f to to line 13. a U.S. shareh	assets of a foreign loreign corporation? older with respect	branch to the Yes No
Section C - Inta	ngible Property	Subject to Section 36	7(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of transf		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

Part IV Additional Information Regarding Transfer of Property (see instructions) 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.51455 % (b) After 0.51455 % 17 Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3) . Yes X No. Gain recognition under section 904(f)(5)(F) . Yes X No. Gain recognition under section 904(f)(5)(F) . Yes X No. Gain recognition under section 904(f)(5)(F) . Yes X No. Gain recognition under section 987 19 Did this transfer result from a change in entity classification? Yes X No. If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the distribution of stock in a foreign controlled corporation — Yes X No. No. In the distribution of stock in a foreign controlled corporation — Yes X No. No. In the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the conduct of U.S. trade or business under	b c d	Did the transferor choose to apply the 20-year inclusion period provided under Regulations section $1.367(d)-1(c)(3)(ii)$ for any intangible property?	Yes Yes Yes	No No No
Part IV Additional Information Regarding Transfer of Property (see instructions) 16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.51455 % (b) After 0.51455 % 17 Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 18 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3) . Yes X No. Gain recognition under section 904(f)(5)(F) . Yes X No. Gain recognition under section 904(f)(5)(F) . Yes X No. Gain recognition under section 904(f)(5)(F) . Yes X No. Gain recognition under section 987 19 Did this transfer result from a change in entity classification? Yes X No. If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the distribution of stock in a foreign controlled corporation — Yes X No. No. In the distribution of stock in a foreign controlled corporation — Yes X No. No. In the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. No. In the conduct of U.S. trade or business under	Supp	plemental Part III Information Required To Be Reported (see instructions)		
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before		·		
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before				
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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before				
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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before				
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16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before				
16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before				
(a) Before	Part	Additional Information Regarding Transfer of Property (see instructions)		
(a) Before				
Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351 Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3) Yes X No Gain recognition under section 904(f)(5)(F) Yes X No Gain recognition under section 904(f)(f)(f)(f)(f) Yes X No Gain recognition for formation for forma	16	g ,		
Indicate whether any transfer reported in Part III is subject to any of the following. a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 19 Did this transfer result from a change in entity classification? 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. 100 N		· · · — · · · · — · · · · · · · · · · ·		
a Gain recognition under section 904(f)(3) b Gain recognition under section 904(f)(5)(F) c Recapture under section 1503(d) d Exchange gain under section 987 19 Did this transfer result from a change in entity classification? 20 a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No X N		· · · · · · · · · · · · · · · · · · ·		
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)? Yes X No. 1 "Yes X No. 1 "Yes X No. 1 "Yes X No. 1 "Yes X No. 2 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation — "Yes X No. Yes X No.		Indicate whether any transfer reported in Part III is subject to any of the following.		
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)? Yes X No. 10 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	а	- 1		
d Exchange gain under section 987 19 Did this transfer result from a change in entity classification? 20 Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. Yes X No. 15 "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. 25 No. 26 No. 27 No.	_			
Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. Yes X No. If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		Gain recognition under section 904(f)(5)(F)	Yes	X No
Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. Yes No If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) C Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	С	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d)	Yes Yes	X No
If "Yes," complete lines 20b and 20c. b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ 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)?	С	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987	Yes Yes Yes	X No X No X No
 b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ►\$ c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation 	c d	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification?	Yes Yes Yes	X No X No X No X No X No X No X No
c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	c d 19	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes Yes Yes Yes Yes	X No X No X No
property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)? Yes X No. 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	c d 19	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes Yes	X No X No X No X No X No X No X No
21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	c d 19 20a	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions If "Yes," complete lines 20b and 20c.	Yes Yes Yes Yes Yes	X No X No X No X No X No X No X No
	c d 19 20 a	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 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) ▶ \$	Yes Yes Yes Yes Yes	X No X No X No X No X No X No X No
	c d 19 20 a	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 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	Yes Yes Yes Yes Yes	X No X No X No X No X No X No X No
covered by section 367(e)(1)? See instructions Yes X No	c d 19 20a b	Gain recognition under section 904(f)(5)(F) Recapture under section 1503(d) Exchange gain under section 987 Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions 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)?	Yes Yes Yes Yes Yes	X No X No X No X No X No

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					
Name	of transferor	Identifying number (see instructions)			
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-063397	1	
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation?	Yes	X No
2	If the transferor was a corporation, complete questions 2a through	gh 2d.			
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 num				
		(-).			
	Controlling shareholder	Ident	ifying number		
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t Name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No
u	Triave basis adjustifients under section 307 (a)(4) been made:] Tes	□ NO
	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such t	ınder se	ection 367)
	Name of partnership	EIN .	of partnership		
	·				
LAK	KESTAR III, LP	98-	1473139		
				1	T1
	Did the partner pick up its pro rata share of gain on the transfer of			Yes	X No
	Is the partner disposing of its $\mbox{\it entire}$ interest in the partnership?			Yes	X No
d	Is the partner disposing of an interest in a limited partnership			1	
	securities market?			Yes	X No
Par	<u> </u>	structions)			
4	Name of transferee (foreign corporation)		5a Identifying nu		any
	LIMEHOME GMBH		FOREI		
6	Address (including country)		5b Reference ID		
	BREINNER STRABE 13/IV		(see instructions)	
	MUNICH GM 80333				
7	Country code of country of incorporation or organization (see ins	structions)			
	GM				
8	Foreign law characterization (see instructions)				
	CORPORATION				
9	Is the transferee foreign corporation a controlled foreign corporation	tion?		Yes	X No

Part III Info		Transfer of Property (see instruct	ons)		
Type of property	(a) Date of transfer	(b) Description of property	Fair mark	c) et value on f transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," sl	rip the remainder of Pa	sferred? art III and go to Part IV.				Yes 🗓 No
Section B - Oth		than intangible prope				(0)
Type of property	(a) Date of transfer	(b) Description of property	Fair mark	c) et value on f transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)	SEE STATEMEN	IT 6				
Property with built-in loss						
Totals						
foreign con If "Yes," go b Was the tr (including If "Yes," cc c Immediate transferee If "Yes," cc d Enter the transferee If "Yes," cc d En	poration? to to line 12b. cansferor a domestic of a branch that is a fore ontinue to line 12c. If the transfer, foreign corporation? continue to line 12d. If the transferred loss amounts.	corporation that transferrign disregarded entity) to 'No," skip lines 12c and was the domestic collino," skip line 12d, and ont included in gross incolerty described in section 3	red substantia a specified 12d, and go to rporation a go to line 13. me as requir	eign disregarde ally all of the as 10%-owned for to line 13. U.S. sharehold	ssets of a foreign beign corporation?	Yes X No
Section C - Inta	ingible Property Su	ubject to Section 367(c	d)			
Type of property	(a) Date of transfer	(b) Description of property		(d) Arm's length price on date of 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	At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in	res No res No res No
15	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	es No
upp	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.	
	(a) Before 0.06633 % (b) After 0.05969 %	
17	Type of nonrecognition transaction (see instructions) ►	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а		es X No
b		es X No
C		es X No
d		es X No
19		es X No
20 a		es X No
_0 u	If "Yes," complete lines 20b and 20c.	21 110
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$\bigs\\$ \q	
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
C		es X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	C3 ZZ NO
4 I	·	es X No

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OMB No. 1545-0026

Par	i ,						
Name	of transferor	Identifying number (•	ons)			
_RC	BERT W. WOODRUFF ARTS CENTER, INC.	<u> 58-06339</u>	71				
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? L	Yes	X	No	
2	If the transferor was a corporation, complete questions 2a through	gh 2d.					
а	a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by						
	five or fewer domestic corporations?			Yes		No	
b Did the transferor remain in existence after the transfer?						No	
	If not, list the controlling shareholder(s) and their identifying num						
		(-).					
	Controlling shareholder	ldent	ifying number				
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t			Yes		No	
	Name of parent corporation	EIN of p	arent corporation	n			
d	Have basis adjustments under section 367(a)(4) been made?			Yes		No	
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection	367),	
	Name of partnership	EIN	of partnership				
T 7\ T	TECHNO III ID	0.0	1473139				
LАГ	XESTAR III, LP	90-	14/3139				
h	Did the partner pick up its pro rata share of gain on the transfer of	of nartnershin assets?		Yes	X	No	
	Is the partner disposing of its entire interest in the partnership?			Yes		No	
	Is the partner disposing of an interest in a limited partnership:				_41	140	
u	securities market?	0 ,		Yes	X	No	
Par	Transferee Foreign Corporation Information (see ins	structions)			[22]		
4	Name of transferee (foreign corporation)	1	5a Identifying r	number, if	anv		
•	NETSPEAK GAMES LTD		FORE		ully		
6	Address (including country)		5b Reference II				
•	1 GILTSPUR STREET		(see instruction				
			•	-			
7	LONDON UK EC1A 9DD Country code of country of incorporation or organization (see ins	structions)					
,		a double)					
8	VK Foreign law characterization (see instructions)						
0	, ,						
0	CORPORATION Is the transferee foreign corporation a controlled foreign corporation.	tion?	Г	Vac	77	N ₂	
9	is the transferee foreign corporation a controlled foreign corporation	uon:		Yes	X	No	

		Transfer of Property (see instructions)		
Section A - Cas	h (a)	(b)	(c)	(4)	/a\
Type of property	Date of transfer	Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash					
	the only property trankip the remainder of P	sferred? art III and go to Part IV.			Yes X No
Section B - Oth		than intangible prope			
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					
	SEE STATEMEN	NT 7			
Other property (not listed under another category)					
Property with built-in loss					
Totals					
foreign collif "Yes," go b Was the tr (including If "Yes," collif "Yes,"	rporation? to to line 12b. transferor a domestic of a branch that is a forest ontinue to line 12c. If all after the transfer foreign corporation? Tontinue to line 12d. If transferred loss amounts for transfer proportions.	corporation that transferreign disregarded entity) to "No," skip lines 12c and was the domestic column, was the domestic column, was the domestic column, skip line 12d, and gunt included in gross incolerty described in section 3 stions 14a through 15.	ed substantially all of the a specified 10%-owned 12d, and go to line 13. The poration a U.S. share to to line 13. The as required under se	ne assets of a foreign bed foreign corporation? Sholder with respect to the corporation 91	ranch Yes No
Section C - Inta	angible Property S	ubject to Section 367(c	d)		
Type of property	(a) Date of transfer	(b) Description of property	(c) (d) Useful Arm's length properties on date of trans		(f) Income inclusion for year of transfer (see instructions)
Property described					
in sec. 367(d)(4)					
Totals					

14a b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in	s No
15	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Ye	s No
upp	Ilemental 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.	
10	(a) Before 0.04682 % (b) After 0.08644 %	
17	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351	
17	······································	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	37
a	Gain recognition under section 904(f)(3)	
b	Gain recognition under section 904(f)(5)(F)	
С	Recapture under section 1503(d) Ye	
d	Exchange gain under section 987 Ye	
19	Did this transfer result from a change in entity classification? Ye	s X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions Let	s X No
	If "Yes," complete lines 20b and 20c.	
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
-	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	s X No
21		
	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions	s X No

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OMB No. 1545-0026

Name of transferor	or information (see instructions)		Identificina accombacto	i		
				Identifying number (see instructions)		
	PRUFF ARTS CENTER, INC.		58-063397		X No	
· ·	ecified 10%-owned foreign corporation tha		orporation?	Yes	A NO	
	a corporation, complete questions 2a throug section 361(a) or (b) transfer, was the trans		an 260(a)) hu			
		•	` '' •	Yes	□ No	
	c corporations? nain in existence after the transfer?				No No	
				Yes	∟ No	
ii not, list the controll	ing shareholder(s) and their identifying num	ber(s).				
Cor	trolling shareholder	Ident	tifying number			
corporation?	a member of an affiliated group filing and employer identification number (EIN) of t			Yes	☐ No	
Name	of parent corporation	EIN OF P	parent corporation			
d Have basis adjustme	nts under section 367(a)(4) been made?			Yes	□ No	
complete questions 3	a partner in a partnership that was the a a through 3d. N of the transferor's partnership.	actual transferor (but is not	treated as such u	under se	ction 367),	
Na	me of partnership	EIN	of partnership			
LAKESTAR III, I	uP		1473139			
b Did the partner pick u	up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X No	
	ng of its entire interest in the partnership?			Yes	X No	
d Is the partner dispos	ing of an interest in a limited partnership	that is regularly traded on a		_		
securities market?				Yes	X No	
	preign Corporation Information (see ins	structions)	I			
4 Name of transferee (5a Identifying nu		any	
STARFISH EQU			FOREI			
6 Address (including co	• /		5b Reference ID (see instructions			
PO BOX 656 EAST WIN			(555 1151 451013	,		
7 Country code of cour	R PORT GK GY1 3PP htry of incorporation or organization (see ins	structions)				
	in y or incorporation or organization (see ins	ou doublis)				
GK8 Foreign law characte	rization (see instructions)					
CORPORATION	nzadon (see madactions)					
9 Is the transferee fore	ign corporation a controlled foreign corpora	tion?		Yes	X No	
	<u> </u>					

		Transfer of Property (see instru	ictions)		
Section A - Cas		4.)				
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," si	the only property trans	rt III and go to Part IV.				Yes X No
	ler Property (other (a)	than intangible property	erty Subje	(c) Section 36	(d)	(e)
Type of property	Date of transfer	Description of property		narket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)	SEE STATEMEN	T 8				
Property with						
built-in loss						
Totals						
foreign co- If "Yes," g b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the f 13 Did the tra If "No," sk	rporation? o to line 12b. ransferor a domestic c a branch that is a forei ontinue to line 12c. If " ely after the transfer, foreign corporation? ontinue to line 12d. If " cransferred loss amountsferor transfer prope ip Section C and ques		red substa o a specifie 12d, and g rporation go to line 1: me as req 367(d)(4)?	ntially all of the as d 10%-owned for to to line 13. a U.S. sharehold 	essets of a foreign breign corporation?	Yes X No
Section C - Inta	angible Property Su	bject to Section 367(d)	T		
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
 Totals						

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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Ilemental Part III Information Required To Be Reported (see instructions)	Yes Yes Yes	No No No
Dout	Additional Information Regarding Transfer of Property (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 0.07013 % (b) After 0.07013 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.	Yes	A NO
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$\bigs\\$		
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
J	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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Name of transferor	Transferor information (see instructions)		Literation in a complete of		>			
				Identifying number (see instructions)				
	. WOODRUFF ARTS CENTER, INC.		58-063397		37			
	sferee a specified 10%-owned foreign corporation tha		orporation? L	Yes	X No			
	feror was a corporation, complete questions 2a throu	•	000()) !					
	fer was a section 361(a) or (b) transfer, was the trans			7				
	er domestic corporations?			Yes	No			
	nsferor remain in existence after the transfer?			Yes	No			
If not, list t	he controlling shareholder(s) and their identifying num	iber(s).						
	Controlling shareholder	Iden	tifying number					
c If the tran	sferor was a member of an affiliated group filing	a consolidated return was	it the parent					
corporation				Yes	No			
	Name of parent corporation	EIN of p	parent corporation	n				
d Have basis	s adjustments under section 367(a)(4) been made?			Yes	No			
complete o	sferor was a partner in a partnership that was the questions 3a through 3d. me and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection 367),			
	Name of partnership	EIN	of partnership					
LAKESTAR	III, LP	98-	1473139					
	rtner pick up its pro rata share of gain on the transfer			Yes	X No			
	ner disposing of its entire interest in the partnership?			Yes	X No			
securities r	ner disposing of an interest in a limited partnership market?			Yes	X No			
Part II Tran	sferee Foreign Corporation Information (see in	structions)	_					
4 Name of tr	ansferee (foreign corporation)		5a Identifying n	umber, if	any			
	NE SMILE GMBH		FORE:					
6 Address (ii	ncluding country)		5b Reference ID					
WINDSCHE	IDSTRABE 18		(see instructions	s)				
BERLIN O		(()						
•	de of country of incorporation or organization (see in	structions)						
<u>GM</u>								
_	w characterization (see instructions)							
<u>CORPOR</u>	ATTON	stion?			77 N.			
9 Is the trans	sferee foreign corporation a controlled foreign corpora	IIIO11?	<u> </u>	Yes	X No			

Part III Info		Transfer of Property (see instru	ctions)		
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," sl	kip the remainder of Pa					Yes X No
Section B - Oth	er Property (other	than intangible prope	rty subjec	ct to section 36	67 (d)) (d)	(e)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)	SEE STATEMEN	T 9				
Property with built-in loss						
Totals						
foreign con If "Yes," go b Was the tr (including If "Yes," cc c Immediate transferee If "Yes," cc d Enter the transferee If "Yes," cc d En	poration? to to line 12b. cansferor a domestic can branch that is a foreigntinue to line 12c. If "ely after the transfer, foreign corporation? continue to line 12d. If "ransferred loss amounts."	orporation that transferr gn disregarded entity) to No," skip lines 12c and was the domestic co No," skip line 12d, and on tincluded in gross incourty described in section 3	that is a formal that i	oreign disregardentially all of the all 10%-owned for to line 13. a U.S. sharehold the distribution of the line 13. b. the sharehold the distribution of the line 13.	ed entity) transferred ssets of a foreign be eign corporation?	Yes X No
Section C - Inta	ngible Property Su	bject to Section 367(d	d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
	• • • • • • • • • • • • • • • • • • • •		
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 0.05043 % (b) After 0.05043 %		
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.		37
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d 40	Exchange gain under section 987	Yes	
19	Did this transfer result from a change in entity classification? Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
20 a	If "Yes," complete lines 20b and 20c.	Yes	ONI LA
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		
C	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	103	110
	covered by section 367(e)(1)? See instructions	Yes	X No
	,(-/(-//		

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Name of transferor		Identificing promise (co			
		Identifying number (see instructions)			
ROBERT W. WOODRUFF ARTS CENTER, INC.		58-0633973		37	
1 Is the transferee a specified 10%-owned foreign corporation tha		orporation? L	Yes	X No	
2 If the transferor was a corporation, complete questions 2a through	=	000()) 1			
a If the transfer was a section 361(a) or (b) transfer, was the trans	•	` ''			
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 num	ber(s).				
Controlling shareholder	ldent	ifying number			
c If the transferor was a member of an affiliated group filing	a consolidated return was	it the perent			
			V		
corporation? If not, list the name and employer identification number (EIN) of t	he perent corporation		Yes	No	
If not, list the name and employer identification number (Elix) of t	ne parent corporation.				
Name of parent corporation	EIN of p	arent corporation			
	-	·			
d Have basis adjustments under section 367(a)(4) been made?			Yes	No No	
				007)	
3 If the transferor was a partner in a partnership that was the	actual transferor (but is not	treated as such u	nder se	ction 367),	
complete questions 3a through 3d.					
a List the name and EIN of the transferor's partnership.					
Name of partnership	EIN (of partnership			
LAKESTAR III, LP	98_	1473139			
DARBOTAR III, DI	70 .	1173137			
b Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X No	
c Is the partner disposing of its entire interest in the partnership?			Yes	X No	
d Is the partner disposing of an interest in a limited partnership		n established	. 00	22 110	
securities market?	-		Yes	X No	
Part Transferee Foreign Corporation Information (see ins	structions)				
4 Name of transferee (foreign corporation)	,	5a Identifying nu	mber, if	any	
TREESPLEASE GAMES LIMITED		FOREI		,	
6 Address (including country)		5b Reference ID			
PRESTON PARK HOUSE, SOUTH ROAD BRIGHTON		(see instructions)			
EAST SUSSEX UK BN1 6SB					
7 Country code of country of incorporation or organization (see ins	structions)				
UK					
8 Foreign law characterization (see instructions)					
CORPORATION					
9 Is the transferee foreign corporation a controlled foreign corpora	tion?	<u> </u>	Yes	X No	

		ransfer of Property (s	see instru	ctions)		
Section A - Cas		(b)		(a)	(4)	(0)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash		1 1 7				
If "Yes," s	the only property transf kip the remainder of Par	t III and go to Part IV.				Yes X No
Section B - Oth		han intangible prope	rty subje			(2)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEMENT	г 10				
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign co If "Yes," g b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the se	rporation? o to line 12b. ransferor a domestic co a branch that is a foreig ontinue to line 12c. If "N ely after the transfer, foreign corporation? ontinue to line 12d. If "N transferred loss amoun	proporation that transferred in disregarded entity) to the skip lines 12c and was the domestic corrections skip line 12d, and got included in gross incorrectly described in section 3 ions 14a through 15.	ed substar a specifie 12d, and g poration go to line 13 me as requ	ntially all of the a d 10%-owned for o to line 13. a U.S. sharehold 3. uired under sectio	issets of a foreign begin to the corporation? It is seen to the corporation on 91 ►\$	ranch Yes X No
Section C - Inta	angible Property Sul	oject to Section 367(c	d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
Part	Additional Information Regarding Transfer of Property (see instructions)		
rart	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 0.08382 % (b) After 0.08382 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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IIS I	of transferor		Identificing promber (i	\	
			Identifying number (see instructions)			
	DBERT W. WOODRUFF ARTS CENTER, INC.		58-063397		X	
1	Is the transferee a specified 10%-owned foreign corporation that If the transferor was a corporation, complete questions 2a through		orporation?	⊻ Yes		NO
_	If the transfer was a section 361(a) or (b) transfer, was the trans		n 368(c)) hy			
а	five or fewer domestic corporations?			Yes		No
h	Did the transferor remain in existence after the transfer?			Yes		No
	If not, list the controlling shareholder(s) and their identifying num					
	The title controlling characteristics (c) and their techniques	551(5).				
	Controlling shareholder	ldent	ifying number			
С	If the transferor was a member of an affiliated group filing a corporation?		_	Yes		No
	If not, list the name and employer identification number (EIN) of t	he parent corporation.				
	Name of parent corporation	EIN of p	arent corporation	1		
d	Have basis adjustments under section 367(a)(4) been made?			Yes		No
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection	367),
	Name of partnership	EIN o	of partnership			
LAF	KESTAR III, LP	98-1	1473139			
	Did the partner pick up its pro rata share of gain on the transfer of the partner disposing of its entire interest in the partnership?			Yes Yes		No No
d	Is the partner disposing of an interest in a limited partnership securities market?			Yes	X	No
Par	t Transferee Foreign Corporation Information (see ins	tructions)				
4	Name of transferee (foreign corporation)		5a Identifying n		any	
_	UNCAPPED LIMITED		FOREI			
6	Address (including country)		5b Reference ID (see instructions			
	INTERNATIONAL HOUSE, 24 HOLBORN VIADUCT		(000 mondono	-1		
7	LONDON UK EC1A 2BN Country code of country of incorporation or organization (see ins	tructions)				
1		u uou0113 j				
	UK					
×	Foreign law characterization (see instructions)					
8	Foreign law characterization (see instructions)					
9	Foreign law characterization (see instructions) CORPORATION Is the transferee foreign corporation a controlled foreign corporation.	ion?		Yes	X	No

	rmation Regarding Ti	ransfer of Property ((see instruc	tions)		
Section A - Cas		(b)		(a)	(4)	(0)
Type of property	(a) Date of transfer	Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
	the only property transfe kip the remainder of Par					Yes 🔀 No
Section B - Oth	er Property (other t	han intangible prope	erty subjec			
Type of property	(a) Date of transfer	(b) Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
	SEE STATEMENT	11				
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign cor If "Yes," go b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	assets of a foreign bran rporation? to to line 12b. tansferor a domestic co a branch that is a foreign continue to line 12c. If "Netly after the transfer, foreign corporation? Continue to line 12d. If "Netly after the 12d. If "Netly after the samount insferor transfer proper ip Section C and questi	rporation that transfer n disregarded entity) to lo," skip lines 12c and was the domestic colo," skip line 12d, and included in gross income ty described in section	red substant o a specified 12d, and go orporation a go to line 13.	tially all of the as 10%-owned fore to line 13. U.S. sharehold	esets of a foreign beign corporation? er with respect to	Yes X No
Section C - Inta	ngible Property Sub	ject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)			+			
Totals						

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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Diemental Part III Information Required To Be Reported (see instructions)	Yes Yes Yes	No No No
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 0.06792 % (b) After 0.06792 %		
17	Type of nonrecognition transaction (see instructions) ►		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		77
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С.	Recapture under section 1503(d)	Yes	X No
d 40	Exchange gain under section 987	Yes	
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.	Yes	LA NO
h	•		
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		
C	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	162	LZY INO
4 I	covered by section 367(e)(1)? See instructions	Yes	X No
	covered by section our (e)(1): oee instructions	163	LZZ INO

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Par						
Name	of transferor		Identifying number (s		ons)	
RC	BERT W. WOODRUFF ARTS CENTER, INC.	58-0633971				
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation?	Yes	X No	
2	If the transferor was a corporation, complete questions 2a through	gh 2d.				
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 num					
		(-).				
	Controlling shareholder	Ident	ifying number			
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t Name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No	
_					.: 007)	
3	If the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such t	ınder se	ction 367)	
	complete questions 3a through 3d.					
a	List the name and EIN of the transferor's partnership.					
	Name of partnership	EIN (of partnership			
T.AK	KESTAR III, LP	98-	1473139			
	abount 111, bi	20	11,010			
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X No	
	Is the partner disposing of its entire interest in the partnership?			Yes	X No	
	Is the partner disposing of an interest in a limited partnership		an established			
_	securities market?			Yes	X No	
Par	Transferee Foreign Corporation Information (see ins	structions)			[21]	
4	Name of transferee (foreign corporation)	,	5a Identifying nu	ımber. if	anv	
-	FLYING PIGS LIMITED		FOREI		<i>y</i>	
6	Address (including country)		5b Reference ID			
•	5 ALUF MOGEN KELMAN		(see instructions			
			•	•		
7	TEL-AVIV JAFFA IS 6107077 Country code of country of incorporation or organization (see ins	etructions)				
,		na aouono,				
	IS					
8	Foreign law characterization (see instructions)					
	CORPORATION	tion?		Va -	77 N-	
9	Is the transferee foreign corporation a controlled foreign corporation	uon!		Yes	X No	

Part Infor		ng Transfer of Property	(see instru	ctions)		
Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Cash	02/17/202	- ' ' '	dutt	3,067.	basis	transisi
If "Yes," sk	rip the remainder o	ansferred? f Part III and go to Part IV.				X Yes No
Section B - Oth	er Property (otr	ner than intangible prop	perty subje	ct to section 3	67(d)) (d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	poration? to to line 12b. ansferor a domest branch that is a foottinue to line 12c. ly after the transforeign corporation ontinue to line 12d. ransferred loss an nsferor transfer pr	branch (including a branch branch (including a branch branch breight breight breight branch b	erred substar to a specifie d 12d, and g corporation d go to line 13 come as requ	ntially all of the a d 10%-owned fo o to line 13. a U.S. sharehol 	assets of a foreign breign corporation? Ider with respect to the corporation on 91 • \$	ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	′(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
(-)(-)						
Totals						
			_			

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?	Yes Yes Yes	No No No
	,		
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before 0.00000 % (b) After 0.02007 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) Significant the demonstration part recognized gain or loss on the distribution of property because the		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	res	LA INO
4 I	covered by section 367(e)(1)? See instructions	Yes	X No
	Covered by Section Covered to the manufactions	169	<u> </u>

(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

C.S. Transferor Information (see instructions)	1				
Name of transferor	• •	dentifying number (see instructions)			
ROBERT W. WOODRUFF ARTS CENTER, INC.	58-06	33971			
1 Is the transferee a specified 10%-owned foreign corporation t	hat is not a controlled foreign corporation?	Yes X No			
2 If the transferor was a corporation, complete questions 2a thr	ough 2d.				
a If the transfer was a section 361(a) or (b) transfer, was the tra	ansferor controlled (under section 368(c)) b	ру			
five or fewer domestic corporations?					
b Did the transferor remain in existence after the transfer?		Yes No			
If not, list the controlling shareholder(s) and their identifying n		• •			
Controlling shareholder	Identifying nur	nber			
c If the transferor was a member of an affiliated group filin corporation? If not, list the name and employer identification number (EIN) of the component of		rent Yes No			
Name of parent corporation	EIN of parent corp	poration			
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. a List the name and EIN of the transferor's partnership. 	e actual transferor (but is not treated as	s such under section 367)			
Name of partnership	EIN of partner	ehin			
Nume of partnersmp	Lin or partiter	silip			
MONTAUK TRIGUARD FUND VII, LP	82-282980	17			
b Did the partner pick up its pro rata share of gain on the transfe	er of partnership assets?	Yes X No			
c Is the partner disposing of its entire interest in the partnership		Yes X No			
d Is the partner disposing of an interest in a limited partnersh					
securities market?					
Part II Transferee Foreign Corporation Information (see	instructions)				
Name of transferee (foreign corporation)	,	fying number, if any			
PTI CAYMAN HOLDCO, LP		REIGNUS			
6 Address (including country)		ence ID number			
C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 1015					
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 corporation	oration?	X Yes No			
For Panerwork Reduction Act Notice, see senarate instructions		Form 926 (Rev. 11-2018			

		g Transfer of Property	(see instru	ctions)		
Section A - Cast		(6)		(a)	(4)	(2)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/202			8.		
If "Yes," sk		Part III and go to Part IV.				X Yes No
Section B - Oth	er Property (oth (a)	er than intangible prop	erty subje	ct to section 3	67(d)) (d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the tra 13 Did the trai	assets of a foreign poration? to to line 12b. ansferor a domestical branch that is a foottinue to line 12c. If a five	branch (including a branch corporation that transfer dereign disregarded entity) to the firm of the fi	rred substar o a specifie 12d, and g orporation go to line 13	ntially all of the additional	ded entity) transferre assets of a foreign bereign corporation? Ider with respect t on 91 \$\bigsim \sum_{\text{s}}\$	d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
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.		
47	(a) Before0.00079 % (b) After0.00079		
17 18	Type of nonrecognition transaction (see instructions) ▶ <u>IRC SECTION 351</u> Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
c	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21			
	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		X No

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OMB No. 1545-0026

Par							
Name	of transferor		Identifying number (see instructions)				
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971				
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? Yes	X No			
2	If the transferor was a corporation, complete questions 2a through	gh 2d.					
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 368(c)) by				
	five or fewer domestic corporations?		Yes	No			
b	Did the transferor remain in existence after the transfer?			No			
	If not, list the controlling shareholder(s) and their identifying numl						
	Controlling shareholder	ldent	tifying number				
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of the same of parent corporation.	he parent corporation.	earent corporation	□ No			
d	Have basis adjustments under section 367(a)(4) been made?		Yes	No			
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such under sec	ction 367)			
	Name of partnership	EIN	of partnership				
MON	TAUK TRIGUARD FUND VII, LP	0.7_	2829807				
1.101	VIAOR IRIGOARD FOND VII, DE	02	2027007				
	Did the partner pick up its pro rata share of gain on the transfer o	of partnership assets?	Yes	X No			
	Is the partner disposing of its entire interest in the partnership?		· · · · · · · · · 	X No			
	Is the partner disposing of an interest in a limited partnership to			21 110			
u	securities market?			X No			
Par		tructions)		X III			
4	Name of transferee (foreign corporation)	de d	5a Identifying number, if	any			
4			· -	arry			
	STONEGATE PUB COMPANY HOLDING SARL Address (including country)		FOREIGNUS 5b Reference ID number				
6	, , , , , , , , , , , , , , , , , , , ,		(see instructions)				
	20, RUE EUGENE RUPPERT		(550 11011 40110110)				
	LUXEMBOURG LU L-2453	tructions)					
7	Country code of country of incorporation or organization (see ins	suuctions)					
	LU						
8	Foreign law characterization (see instructions)						
	CORPORATION						
9	Is the transferee foreign corporation a controlled foreign corporat	tion?	X Yes	No			

		g Transfer of Property	(see instruc	tions)		
Section A - Casl		(6)		(2)	(4)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) ket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	03/21/202			30.		
lf "Yes," sk		Part III and go to Part IV.				X Yes No
Section B - Oth	er Property (oth	er than intangible prop	erty subject	t to section 36	7(d)) (d)	(e)
Type of property	Date of transfer	Description of property		ket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Dramanti e seith						
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 t 13 Did the tra	poration? to to line 12b. ansferor a domesti a branch that is a footninue to line 12c. ly after the transfereign corporation ontinue to line 12d. ransferred loss am ansferor transfer pro	branch (including a branch corporation that transfer oreign disregarded entity) to lif "No," skip lines 12c and fer, was the domestic corporation of the skip line 12d, and ount included in gross incorporations 14a through 15.	h that is a for rred substant to a specified 12d, and go orporation a go to line 13. ome as requi	ially all of the as 10%-owned for to line 13. U.S. sharehold	ed entity) transferred seets of a foreign beign corporation?	d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No
c 21	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 Yes	X No

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OMB No. 1545-0026

Par							
Name	of transferor		Identifying number (see instructions)				
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971				
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation?	Yes	X No		
2	If the transferor was a corporation, complete questions 2a through	gh 2d.					
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 numl						
	Controlling shareholder	Ident	ifying number				
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of the name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No		
_	That's basis adjustinishes all as seed of (a)(1) best made:			05			
3	If the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such i	under se	ection 367)		
	complete questions 3a through 3d.						
a	List the name and EIN of the transferor's partnership.						
	Name of partnership	EIN (of partnership				
N # C N			2829807				
MOI	TAUK TRIGUARD FUND VII, LP	02-	2029007				
	Did the partner pick up its pro rata share of gain on the transfer o	of nartnership assets?		Yes	X No		
	Is the partner disposing of its entire interest in the partnership?			Yes	X No		
	Is the partner disposing of an interest in a limited partnership to] 163	A NO		
u				Yes	X No		
Par	securities market?	tructions)		163	[A] NO		
4	Name of transferee (foreign corporation)	structions)	Eo Idontifying n	ımbar if			
4			5a Identifying nu		any		
-	VEPF V POLARIS BLOCKER		FOREI				
6	Address (including country)		5b Reference ID (see instructions				
	C/O MAPLES CORPORATE SERVICES LIMITED PO BOX 309 UGLAN		(500 11511 0010115	,			
_	GRAND CAYMAN CJ KY1-1104	tructions)					
7	Country code of country of incorporation or organization (see ins	structions)					
	CJ						
8	Foreign law characterization (see instructions)						
	PARTNERSHIP			1			
9	Is the transferee foreign corporation a controlled foreign corporat	tion?		Yes	X No		

	<u> </u>					
		Transfer of Property (s	see instru	ctions)		
Section A - Casl		45		(-)	(-1)	(-)
Type of	(a) Date of	(b) Description of	Fair m	(c) arket value on	(d) Cost or other	(e) Gain recognized on
property	transfer	property		e of transfer	basis	transfer
 Cash						
	the only property transitip the remainder of P	sferred? art III and go to Part IV.				Yes X No
Section B - Oth	er Property (other	than intangible prope	rty subje	ct to section 3	67(d))	
Type of	(a)	(b)	T	(c)	(d)	(e)
property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities	SEE STATEMEN	JT 12				
Inventory						
Other property						
(not listed under						
another category)						
Property with						
built-in loss						
24.11.11.1000						
 Totals						
recognition 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 t 13 Did the tra If "No," ski	n agreement was filed assets of a foreign braporation? to to line 12b. ansferor a domestic of a branch that is a fore ontinue to line 12c. If a straight of the transfer foreign corporation? If the straight of the transfer of the straight	corporation that transferreign disregarded entity) to 'No," skip lines 12c and 1 was the domestic cor "No," skip line 12d, and got included in gross incorerty described in section 3 stions 14a through 15.	that is a f ed substar a specified 2d, and g poration to to line 1: me as req 667(d)(4)?	oreign disregard Intially all of the a d 10%-owned fo o to line 13. a U.S. sharehol 3. uired under section	led entity) transferred assets of a foreign bring reign corporation?	Yes X No I to a Yes X No Tanch Yes No
Section C - Inta	ngible Property S	ubject to Section 367(d	l)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
(~/(·/						
T-1-1-						
Totals						

14a b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) \$\Bigsim \Bigsim	Yes Yes	No No No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
3upp	Iemental 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 0.0000 % (b) After 0.00017 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)	•				
Name	of transferor		Identifying number (see instructions)			
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971			
1	Is the transferee a specified 10%-owned foreign corporation that		orporation? Yes X No			
2	If the transferor was a corporation, complete questions 2a through		000(-))			
а	If the transfer was a section 361(a) or (b) transfer, was the transfer, or force of the corporation 2	•	* * * *			
h	five or fewer domestic corporations? b Did the transferor remain in existence after the transfer?					
b	If not, list the controlling shareholder(s) and their identifying num		Yes No			
	in not, not the controlling charefulacity and their identifying fiding					
	Controlling shareholder	Ident	tifying number			
С	If the transferor was a member of an affiliated group filing corporation?					
	corporation? If not, list the name and employer identification number (EIN) of t	he 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 a 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			
	MONTAUK TRIGUARD FUND VII, LP	82-	2829807			
b	Did the partner pick up its pro rata share of gain on the transfer of	f partnership assets?	Yes X No			
	Is the partner disposing of its entire interest in the partnership?					
	Is the partner disposing of an interest in a limited partnership	that is regularly traded on a	an established			
	securities market?		Yes X No			
Par	u i	structions)	E. H. W. L. L. E. L.			
4	Name of transferee (foreign corporation)	`	5a Identifying number, if any			
6	PHOENIX TOWER IRELAND HOLDCO LIMITED Address (including country))	FOREIGNUS 5b Reference ID number (see instructions)			
	C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154					
7	Country code of country of incorporation or organization (see ins	tructions)				
8	Foreign law characterization (see instructions)					
	RPORATION	tion?	[V]			
9	Is the transferee foreign corporation a controlled foreign corpora	uon:	X Yes No			

		g Transfer of Property	(see instruc	tions)		
Section A - Casl		(6)		(5)	(4)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/202			13.		
If "Yes," sk	rip the remainder o	ansferred? f Part III and go to Part IV. ner than intangible prop	erty subjec	t to section 36		X Yes No
Type of property	(a) Date of	(b) Description of	Fair ma	(c) rket value on	(d) Cost or other	(e) Gain recognized on
Stock and securities	transfer	property	date	of transfer	basis	transfer
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
recognition 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	n agreement was fi assets of a foreign poration? to to line 12b. ansferor a domest a branch that is a fo ontinue to line 12c. ly after the trans foreign corporation ontinue to line 12d. ransferred loss am nsferor transfer proposed on the proposed of the	If "No," skip line 12d, and ount included in gross incoperty described in section uestions 14a through 15.	erred substanto a specified 12d, and go orporation a go one as required 367(d)(4)?	reign disregarde tially all of the a 10%-owned for to line 13. U.S. sharehold	ed entity) transferred ssets of a foreign beign corporation? der with respect to n 91 \$	Yes No d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	<u>'(d)</u>			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
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 0.0000 % (b) After 0.00079 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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OMB No. 1545-0026

Par						
Name	of transferor		Identifying number (s		ons)	
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971			
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? L	Yes	X No	
2	If the transferor was a corporation, complete questions 2a through	gh 2d.				
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 num					
	Controlling shareholder	Ident	ifying number			
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of to the name of parent corporation	he parent corporation.	· —	Yes	□ No	
d	Have basis adjustments under section 367(a)(4) been made?			Yes	No	
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such (under se	ection 367),	
	Name of partnership	FIN	of partnership			
	·					
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807			
	Did the newton wield on its one acts there at wein on the transfer of	f		V	37 11	
	Did the partner pick up its pro rata share of gain on the transfer of			Yes	X No	
	Is the partner disposing of its entire interest in the partnership?			Yes	X No	
d	Is the partner disposing of an interest in a limited partnership			٦.,	··	
_	securities market?			Yes	X No	
Par	<u> </u>	structions)				
4	Name of transferee (foreign corporation)		5a Identifying nu		any	
	LINCOLN HOLDINGS SARL		FOREI			
6	Address (including country)		5b Reference ID	number		
	20, RUE EUGENE RUPPERT B191769		(see instructions)		
	LUXEMBOURG LU B190439					
7	Country code of country of incorporation or organization (see ins	structions)				
	LU					
8	Foreign law characterization (see instructions)					
	PARTNERSHIP					
9	Is the transferee foreign corporation a controlled foreign corporation	tion?		Yes	X No	
	<u> </u>					

		ng Transfer of Property	(see instruc	ctions)		
Section A - Casl		(h)		(2)	(4)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	06/28/202			5.		
If "Yes," sk	rip the remainder o	ansferred? f Part III and go to Part IV. ner than intangible pro	nerty subjec	et to section 3	67(d))	X Yes No
Type of property	(a) Date of transfer	(b) Description of property	Fair ma	(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	transisi	ргоролу	dute	or transfer	Badio	ti di loi
Inventory						
Other property (not listed under another category)						
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 13 Did the trai	assets of a foreign poration? to to line 12b. ansferor a domest a branch that is a fontinue to line 12c. ly after the transforeign corporation ontinue to line 12d. ransferred loss am ansferor transfer principle.	led? branch (including a branch branch) ic corporation that transferreign disregarded entity) If "No," skip lines 12c and fer, was the domestic of the second or skip line 12d, and the second or se	erred substant to a specified d 12d, and go corporation ad go to line 13 come as requ	tially all of the and the standard the standard the standard to the standard the st	ed entity) transferre assets of a foreign be reign corporation? Ider with respect to on 91 \$\incide*\begin{cases} \text{con 91} \text{ \infty}	oranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	7(d)			1
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in	s No
15	Regulations section 1.367(d)-1(c)(3)(ii) ▶ \$ Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	s No
upp	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.	
	(a) Before 0.00011 % (b) After 0.00011 %	
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.	37 N
a	Gain recognition under section 904(f)(3)	
b	Gain recognition under section 904(f)(5)(F)	
С	Recapture under section 1503(d) Ye	
d	Exchange gain under section 987 Ye	
19	Did this transfer result from a change in entity classification?	
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions L Ye	s X No
	If "Yes," complete lines 20b and 20c.	
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$	
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	s X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	
	covered by section 367(e)(1)? See instructions	s X No
	, , , , , , , , , , , , , , , , , , , ,	

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OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)						
Name	of transferor		Identifying number (se	e instructi	ons)		
RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633973	1			
1	Is the transferee a specified 10%-owned foreign corporation tha	t is not a controlled foreign c	orporation?	Yes	Х	No	
2	If the transferor was a corporation, complete questions 2a through		,				
а	a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by						
	five or fewer domestic corporations?			Yes		No	
h	Did the transferor remain in existence after the transfer?			Yes		No	
	If not, list the controlling shareholder(s) and their identifying num						
	The time controlling on a choice of and their rechtifying ham	1501(0).					
	Controlling shareholder	Iden	tifying 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 state of the sta			Yes		No	
		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 complete questions 3a through 3d.	actual transferor (but is not	treated as such u	nder se	ection	n 367),	
а	List the name and EIN of the transferor's partnership.						
	Name of partnership	EIN	of partnership				
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807				
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	Х	No	
	Is the partner disposing of its entire interest in the partnership?			Yes	X		
	Is the partner disposing of an interest in a limited partnership					,	
_	securities market?			Yes	X	No	
Par		structions)				'	
4	Name of transferee (foreign corporation)	,	5a Identifying nu	mber, if	any		
	VOI TECHNOLOGY AB		FOREIG		•		
6	Address (including country)		5b Reference ID				
	OSTERMALMSGATAN 26		(see instructions)				
	STOCKHOLM SW 114 26						
7	Country code of country of incorporation or organization (see ins	structions)	ı				
	SW	,					
8	Foreign law characterization (see instructions)						
	CORPORATION						
9	Is the transferee foreign corporation a controlled foreign corpora	tion?		Yes		No	
	J		Δ				

		ng Transfer of Property	(see instruc	ctions)		
Section A - Cas		(b)		(c)	(4)	(a)
Type of property	(a) Date of transfer	Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/02/202	2		57.		
If "Yes," sk		f Part III and go to Part IV.				X Yes No
Section B - Oth	 	ner than intangible prop	erty subjec		<u> </u>	
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
D						
Property with built-in loss						
2 dt 1995						
 Totals						
foreign cor If "Yes," go b Was the tr (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t	assets of a foreign poration? to to line 12b. ansferor a domest a branch that is a fontinue to line 12c. ly after the transforeign corporation on tinue to line 12d. ransferred loss an insferor transfer pr	led? branch (including a branch branch (including a branch discontinuous) branch breign disregarded entity) to the "No," skip lines 12c and fer, was the domestic content of the "No," skip line 12d, and nount included in gross incomperty described in section uestions 14a through 15.	rred substan o a specified 12d, and go orporation a go to line 13 ome as requ	tially all of the a d 10%-owned for to line 13. d U.S. sharehold	ssets of a foreign beeign corporation? der with respect to the set of the se	ranch
Section C - Inta	ngible Property	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No
c 21	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 Yes	X No

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OMB No. 1545-0026

Par	,							
Name	of transferor		Identifying number (ons)			
_RC	ROBERT W. WOODRUFF ARTS CENTER, INC.			58-0633971				
1	Is the transferee a specified 10%-owned foreign corporation tha	t is not a controlled foreign co	orporation? L	Yes	X	No		
2	If the transferor was a corporation, complete questions 2a through	gh 2d.						
а	a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by							
	five or fewer domestic corporations?			Yes		No		
b	Did the transferor remain in existence after the transfer?			Yes		No		
	If not, list the controlling shareholder(s) and their identifying num							
	Controlling shareholder	Ident	ifying number					
	If the transferor was a member of an affiliated group filing corporation? If not, list the name and employer identification number (EIN) of to the Name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes Yes		No		
u	nave basis adjustifients under section 307 (a)(4) been made?		∟	_ res	ш	NO		
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection	367),		
	Name of partnership	EIN	of partnership					
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807					
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X	No		
	Is the partner disposing of its entire interest in the partnership?			Yes	Х	No		
	Is the partner disposing of an interest in a limited partnership			_		-		
	securities market?			Yes	X	No		
Par	Transferee Foreign Corporation Information (see ins	structions)						
4	Name of transferee (foreign corporation)		5a Identifying n	umber, if	any			
	OPTIMA GROUP SARL		FOREI		•			
6	Address (including country)		5b Reference ID	number				
	20, RUE EUGENE RUPPERT		(see instructions	s)				
	LUXEMBOURG LU B190439							
7	Country code of country of incorporation or organization (see ins	structions)						
-	LU	,						
8	Foreign law characterization (see instructions)							
-	PARTNERSHIP							
9	Is the transferee foreign corporation a controlled foreign corpora	tion?		Yes	v	No		
<u> </u>					Δ			

		g Transfer of Property	/ (see instru	ıctions)		
Section A - Casl		(1)			7.0	
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	02/11/202	1		11.		
If "Yes," sk		ansferred? Part III and go to Part IV. er than intangible pro	nerty subje	ct to section	367(d))	X Yes No
		(b)	perty subje	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		narket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	assets of a foreign poration? to line 12b. ansferor a domesti a branch that is a foontinue to line 12c. ly after the transforeign corporation ontinue to line 12d. ransferred loss am asferor transfer pro-	branch (including a branch corporation that transfer oreign disregarded entity) If "No," skip lines 12c and it, was the domestic ore; If "No," skip line 12d, and ount included in gross indeperty described in section uestions 14a through 15.	erred substa to a specifie d 12d, and g corporation d go to line 1 come as req	oreign disregar ntially all of the id 10%-owned f go to line 13. a U.S. shareh 	assets of a foreign boreign corporation? older with respect to	oranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	7(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pri on date of transf		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No
c 21	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 Yes	X No

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OMB No. 1545-0026

Part I	U.S. Transferor Information (see instructions)	•			
Name of t	transferor		Identifying number (see instructions)		
	ERT W. WOODRUFF ARTS CENTER, INC.		58-0633971		
	the transferee a specified 10%-owned foreign corporation that		orporation? Yes X No		
	the transferor was a corporation, complete questions 2a through		000())		
	a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations?				
	d the transferor remain in existence after the transfer?				
	not, list the controlling shareholder(s) and their identifying num				
	not, not the controlling shareholder (b) and their lacking half				
	Controlling shareholder	Iden	tifying number		
	the transferor was a member of an affiliated group filing				
lf ı	rporation? not, list the name and employer identification number (EIN) of t	he parent corporation.	Yes No		
	Name of parent corporation	EIN of p	parent corporation		
d Ha	ave basis adjustments under section 367(a)(4) been made?		Yes No		
	the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such under section 367),		
	emplete questions 3a through 3d.				
a Lis	st the name and EIN of the transferor's partnership.				
	Name of partnership	EIN	of partnership		
Mo	ONTAUK TRIGUARD FUND VII, LP	82-	2829807		
b Di	d the partner pick up its pro rata share of gain on the transfer o	of partnership assets?	Yes X No		
	the partner disposing of its entire interest in the partnership?				
d Is	the partner disposing of an interest in a limited partnership	that is regularly traded on a	an established		
	curities market?		Yes X No		
Part II	9 1	structions)	T =		
	ame of transferee (foreign corporation)		5a Identifying number, if any		
	LOBAL INDUSTRIAL HOLDINGS SARL dress (including country)		FOREIGNUS 5b Reference ID number		
	,		(see instructions)		
	C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154 Duntry code of country of incorporation or organization (see ins	tructions)			
8 Fo	oreign law characterization (see instructions)				
PARTI	NERSHIP				
9 ls	the transferee foreign corporation a controlled foreign corpora	tion?	Yes X No		

		g Transfer of Property (see instru	ctions)		
Type of property	(a) Date of transfer	(b) Description of		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2021	property	uate	18.	Dasis	transiei
10 Was cash	the only property tra	nsferred? Part III and go to Part IV.				X Yes No
Section B - Oth	er Property (othe	er than intangible prope	erty subje	ct to section 36	6 7(d)) (d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee of If "Yes," co d Enter the tra Did the trail	poration? to to line 12b. ansferor a domestic a branch that is a for ontinue to line 12c. I y after the transfer foreign corporation? ontinue to line 12d. I ransferred loss amountsferor transfer pro	corporation that transfer reign disregarded entity) to f "No," skip lines 12c and er, was the domestic co	red substar o a specified 12d, and go propration a go to line 13 ome as requ	oreign disregardontially all of the add 10%-owned for the total line 13. a U.S. shareholomics.	ed entity) transferred assets of a foreign be reign corporation?	ranch Yes No
Section C - Inta	ngible Property S	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of 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	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in	s No
15	Regulations section 1.367(d)-1(c)(3)(ii) ► \$ Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	es No
upp	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.	
	(a) Before 0.00666 % (b) After 0.00666 %	
17	Type of nonrecognition transaction (see instructions) ►	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а	Gain recognition under section 904(f)(3)	s X 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?	
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	
_ u	If "Yes," complete lines 20b and 20c.	.5 [21] 110
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$\bigs\\$ =	
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
C	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	s X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	S AT INO
4 I		s X No
	covered by section 367(e)(1)? See instructions	C Y NI-

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U.S. Transferor Information (see instructions)

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OMB No. 1545-0026

Name of transferor		Identifying number (see instructions)			
ROBERT W. WOODRUFF ARTS CENTER, INC.		58-0633971			
1 Is the transferee a specified 10%-owned foreign corporation that	_	prporation? Yes X No			
2 If the transferor was a corporation, complete questions 2a throu	•				
a If the transfer was a section 361(a) or (b) transfer, was the tran					
five or fewer domestic corporations?					
b Did the transferor remain in existence after the transfer?		Yes L No			
If not, list the controlling shareholder(s) and their identifying num	nber(s).				
Controlling shareholder	Ident	ifying number			
c If the transferor was a member of an affiliated group filing corporation? If not, list the name and employer identification number (EIN) of					
Name of parent corporation	EIN of p	arent 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 not	treated as such under section 367			
a List the name and EIN of the transferor's partnership.	T				
Name of partnership	EIN o	of partnership			
MONTAUK TRIGUARD FUND VII, LP		2829807			
L. Did the control of	of months and him accorded	V 77 N			
b Did the partner pick up its pro rata share of gain on the transferc Is the partner disposing of its entire interest in the partnership?		Yes X No			
d Is the partner disposing of an interest in a limited partnership					
securities market?					
Part II Transferee Foreign Corporation Information (see in	structions)	22 133			
Name of transferee (foreign corporation)	,	5a Identifying number, if any			
PVC EUROPE GROUP SARL		FOREIGNUS			
6 Address (including country)		5b Reference ID number (see instructions)			
7 Country code of country of incorporation or organization (see in	structions)				
Foreign law characterization (see instructions)					
PARTNERSHIP					
9 Is the transferee foreign corporation a controlled foreign corpora	ation?	Yes X No			
For Panerwork Reduction Act Notice see senarate instructions		Form 926 (Rev. 11-201)			

Part III Infor	mation Regarding	Transfer of Property	see instru	ıctions)		
Section A - Casl						
Type of property	(a) Date of transfer	(b) Description of property		(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2021			11.		
lf "Yes," sk		nsferred? Part III and go to Part IV. In than intangible prope	erty subje	oct to section 3	67(d))	X Yes No
Type of property	(a) Date of transfer	(b) Description of property	Fair n	(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	ttansiei	property	uat	e or transfer	Dasis	transier
Inventory						
Other property (not listed under another category)						
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 Did the tra	poration? to to line 12b. ansferor a domestic a branch that is a fore ontinue to line 12c. If ly after the transfe foreign corporation? ontinue to line 12d. If ransferred loss amo nsferor transfer prop	corporation that transfer eign disregarded entity) to "No," skip lines 12c and r, was the domestic co	red substa o a specifie 12d, and corporation go to line 1	ntially all of the ed 10%-owned for to line 13. a U.S. shareho	assets of a foreign boreign corporation?	ranch
Section C - Inta	ngible Property S	Subject to Section 367(d)	I		
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

14a b c	Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in	s No
15	Regulations section 1.367(d)-1(c)(3)(ii) ► \$ Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	es No
upp	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.	
	(a) Before 0.00666 % (b) After 0.00666 %	
17	Type of nonrecognition transaction (see instructions) ►	
18	Indicate whether any transfer reported in Part III is subject to any of the following.	
а	Gain recognition under section 904(f)(3)	s X 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?	
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	
_ u	If "Yes," complete lines 20b and 20c.	.5 [21] 110
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$\bigs\\$ =	
C	Did the domestic corporation not recognize gain or loss on the distribution of property because the	
C	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	s X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	S AT INO
4 I		s X No
	covered by section 367(e)(1)? See instructions	C Y NI-

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OMB No. 1545-0026

	.S. Transferor Information (see instructions)							
Name of transfe	me of transferor			ee instructio	ns)			
ROBERT	'W. WOODRUFF ARTS CENTER, INC.		58-0633971					
1 Is the t	ransferee a specified 10%-owned foreign corporation tha	t is not a controlled foreign co	orporation? L	Yes	X	No		
2 If the t	ransferor was a corporation, complete questions 2a throu	gh 2d.						
a If the t	ransfer was a section 361(a) or (b) transfer, was the trans	sferor controlled (under section	on 368(c)) by	_				
five or	fewer domestic corporations?			Yes		No		
	transferor remain in existence after the transfer?			Yes		No		
	ist the controlling shareholder(s) and their identifying num							
		()						
	Controlling shareholder	Ident	tifying number					
corpor If not, I	transferor was a member of an affiliated group filing ation? ist the name and employer identification number (EIN) of too Name of parent corporation passis adjustments under section 367(a)(4) been made?	he parent corporation.	parent corporation	Yes		No		
comple	transferor was a partner in a partnership that was the a ste questions 3a through 3d. e name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such u	under sed	ction	367),		
	Name of partnership	EIN	of partnership					
	Name of partnership		•					
MONTAUK	TRIGUARD FUND VII, LP	82-	2829807					
	partner pick up its pro rata share of gain on the transfer of			Yes	X	No		
c Is the	partner disposing of its entire interest in the partnership? .			Yes	Χ	No		
d Is the	partner disposing of an interest in a limited partnership	that is regularly traded on a	an established	-				
securit	ies market?			Yes	Χ	No		
Part II T	ransferee Foreign Corporation Information (see ins	structions)						
4 Name	of transferee (foreign corporation)		5a Identifying nu	ımber, if a	any			
STRA	TEGIC ASSETS GROUP SARL		FOREI(GNUS				
	s (including country)		5b Reference ID	number				
23, <i>I</i>	VENUE MONTEREY		(see instructions))				
LUXEN	BOURG LU L-2163							
	y code of country of incorporation or organization (see ins	structions)						
LU	•							
	n law characterization (see instructions)							
•	ORATION							
9 Is the 1	ransferee foreign corporation a controlled foreign corpora	tion?	x	Yes		No		

		g Transfer of Property	(see instru	ctions)		
Section A - Casl		(1.)		(-)	(4)	(-)
Type of property	(a) Date of transfer	(b) Description of property	I	(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/202			13.		
If "Yes," sk	cip the remainder o	ansferred? f Part III and go to Part IV. er than intangible pro	nerty subje	ct to section 3		X Yes No
Type of property	(a) Date of transfer	(b) Description of property	Fair m	(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	transier	рторенту	dati	e or transier	Daois	uansiei
Inventory						
Other property (not listed under another category)						
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 t 13 Did the tra	poration? to to line 12b. ansferor a domestive a branch that is a footninue to line 12c. Ity after the transforeign corporation on tinue to line 12d. ransferred loss amonsferor transfer pro-	branch (including a branch corporation that transference or eight disregarded entity) If "No," skip lines 12c and fer, was the domestic or? If "No," skip line 12d, and ount included in gross incorporate described in section uestions 14a through 15.	erred substanto a specified 12d, and goorporation digo to line 13	ntially all of the d 10%-owned fo to line 13. a U.S. shareho	assets of a foreign because of a foreign corporation? Index with respect to the second of the seco	oranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	7(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pricon date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
						<u> </u>
Totals						

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?	Yes Yes Yes	No No No
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) Before0.00782_ % (b) After0.00782% Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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Par						
Name	of transferor		Identifying number (see instructions)			
_RO	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971			
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? Yes	X No		
2	If the transferor was a corporation, complete questions 2a through	gh 2d.				
а	If the transfer was a section 361(a) or (b) transfer, was the trans	sferor controlled (under section	on 368(c)) by			
	five or fewer domestic corporations?		Yes	No		
	Did the transferor remain in existence after the transfer?			☐ No		
	If not, list the controlling shareholder(s) and their identifying numl					
	, , , , , , , , , , , , , , , , , , , ,	()				
	Controlling shareholder	Ident	tifying number			
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of to the name of parent corporation. Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	yes oarent corporation	□ No		
u	Trave basis adjustments under section our (a)(4) been made:					
	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such under se	ection 367)		
	Name of partnership	EIN	of partnership			
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807			
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?	Yes	X No		
С	Is the partner disposing of its entire interest in the partnership?		Yes	X No		
d	Is the partner disposing of an interest in a limited partnership	that is regularly traded on a	an established			
	securities market?		Yes	X No		
Par		structions)				
4	Name of transferee (foreign corporation)		5a Identifying number, if	any		
	SPECIAL PACKAGING SOLUTIONS HOLDINGS	S SARL	FOREIGNUS			
6	Address (including country)		5b Reference ID number			
	23, AVENUE MONTEREY		(see instructions)			
	LUXEMBOURG LU L-2163					
7	Country code of country of incorporation or organization (see ins	structions)	1			
	LU					
8	Foreign law characterization (see instructions)					
	CORPORATION					
9	Is the transferee foreign corporation a controlled foreign corporation	tion?	X Yes	No		

Section A - Cash		g Transfer of Property	(see msuu	cuoris)		
Type of property	(a) Date of transfer	(b) Description of property		(c) parket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/202			72.		
If "Yes," sk	tip the remainder o	ansferred? Part III and go to Part IV.				X Yes No
	er Property (otr (a)	er than intangible prop	perty subje	ct to section 30	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee f If "Yes," co d Enter the tra 13 Did the trai	poration? to to line 12b. ansferor a domestive to line 12c. y after the transforeign corporation on tinue to line 12d. ransferred loss amonsferor transfer pro-	branch (including a branch comporation that transfer oreign disregarded entity) If "No," skip lines 12c and fer, was the domestic of? If "No," skip line 12d, and ount included in gross incorperty described in section uestions 14a through 15.	erred substanto a specified 12d, and goorporation digoto line 13	ntially all of the a d 10%-owned for o to line 13. a U.S. sharehol 	assets of a foreign b reign corporation? der with respect to on 91 ▶\$	ranch
Section C - Inta	ngible Property	Subject to Section 367	7(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
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 0.00719 % (b) After 0.00719 %		
17	Type of nonrecognition transaction (see instructions) ▶		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		X No
24	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	LA NO
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	□ va-	X No
	covered by section 367(e)(1)? See instructions	Yes	LA NO

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Part	U.S. Transferor Information (see instructions)					
Name	of transferor		Identifying number (s	ee instructi	ions)	
RO	BERT W. WOODRUFF ARTS CENTER, INC.		58-063397	1		
	Is the transferee a specified 10%-owned foreign corporation tha	t is not a controlled foreign co		Yes	Х	No
	If the transferor was a corporation, complete questions 2a through		,			
	If the transfer was a section 361(a) or (b) transfer, was the trans		on 368(c)) by	_		_
	five or fewer domestic corporations?			Yes		No
	Did the transferor remain in existence after the transfer?			Yes		No
	If not, list the controlling shareholder(s) and their identifying num					
		. ,				
	Controlling shareholder	Iden	tifying number			
	16.11		** **			
	If the transferor was a member of an affiliated group filing corporation? If not, list the name and employer identification number (EIN) of the second seco		_	Yes		No
	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	actual transferor (but is not	treated as such i	under se	ection	367),
	complete questions 3a through 3d.					
a	List the name and EIN of the transferor's partnership.					
	Name of partnership	EIN	of partnership			
MON	TAUK TRIGUARD FUND VII, LP	82_	2829807			
1.101	TAOK IKIGOAKD FOND VII, DE	02	2027007			
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	Х	No
	Is the partner disposing of its entire interest in the partnership?			Yes	X	
	Is the partner disposing of an interest in a limited partnership					,
	securities market?			Yes	X	No
Part	Transferee Foreign Corporation Information (see ins	structions)				
4	Name of transferee (foreign corporation)		5a Identifying nu	umber, if	any	
	GLOBAL FURNITURE HOLDINGS SARL		FOREI		•	
6	Address (including country)		5b Reference ID	number		
	23, AVENUE MONTEREY		(see instructions)		
	LUXEMBOURG LU L-2163					
7	Country code of country of incorporation or organization (see ins	structions)	•			
_	LU					
8	Foreign law characterization (see instructions)					
	CORPORATION					,
9	Is the transferee foreign corporation a controlled foreign corpora	tion?	X	Yes		No

Part III Infor	mation Regardin	g Transfer of Property ((see instrud	ctions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2023	1		188.		
lf "Yes," sk		Part III and go to Part IV.				X Yes No
	er Property (oth	er than intangible prop	erty subjec	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
2 din 1 in 1000						
 Totals						
foreign cor If "Yes," go b Was the trace (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t	poration? to to line 12b. ansferor a domestical branch that is a fountinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer products.	c corporation that transfer reign disregarded entity) to If "No," skip lines 12c and er, was the domestic co	rred substan o a specified 12d, and go orporation a go to line 13 ome as requ	tially all of the d 10%-owned fo o to line 13. d U.S. shareho	assets of a foreign boreign corporation?	ranch
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
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 0.00719 % (b) After 0.00719 %		
17	Type of nonrecognition transaction (see instructions) ▶		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		X No
24	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	LA NO
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	□ va-	X No
	covered by section 367(e)(1)? See instructions	Yes	LA NO

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Par	U.S. Transferor Information (see instructions)		•	
Name	of transferor		Identifying number (see ins	tructions)
RC	DBERT W. WOODRUFF ARTS CENTER, INC.		58-0633971	
1	Is the transferee a specified 10%-owned foreign corporation tha	t is not a controlled foreign c	orporation? Ye	s X No
2	If the transferor was a corporation, complete questions 2a through		,	
а	If the transfer was a section 361(a) or (b) transfer, was the trans	_	on 368(c)) by	
	five or fewer domestic corporations?			s No
b	Did the transferor remain in existence after the transfer?			
	If not, list the controlling shareholder(s) and their identifying num			
	Controlling shareholder	Iden	tifying 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 second seco			s No
	Name of parent corporation	EIN of p	parent corporation	
d	Have basis adjustments under section 367(a)(4) been made?		Ye	s No
3	If the transferor was a partner in a partnership that was the	actual transferor (but is not	treated as such unde	r section 367),
	complete questions 3a through 3d.			
a	List the name and EIN of the transferor's partnership.			
	Name of partnership	EIN	of partnership	
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807	
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?	Ye	s X No
	Is the partner disposing of its entire interest in the partnership?			
	Is the partner disposing of an interest in a limited partnership			
-	securities market?			s X No
Par		structions)		
4	Name of transferee (foreign corporation)	,	5a Identifying number	er, if any
	BY MILES GROUP LTD		FOREIGNU	-
6	Address (including country)		5b Reference ID num	
	2-14 SHORTLANDS HAMMERSMITH		(see instructions)	
	LONDON UK W6 8DJ			
7	Country code of country of incorporation or organization (see ins	structions)	ı	
	UK	,		
8	Foreign law characterization (see instructions)			
	PARTNERSHIP			
9	Is the transferee foreign corporation a controlled foreign corpora	tion?	Ye	s X No
	<u> </u>			- [41]

Part III Infor	rmation Regarding T	ransfer of Property (s	see instru	ıctions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property	1	(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash						
If "Yes," sl	the only property transfection	t III and go to Part IV.				Yes X No
Section B - Oth	er Property (other t	han intangible prope	rty subje		· ,,	
Type of property	(a) Date of transfer	(b) Description of property	1	(c) narket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities	SEE STATEMENT	13				
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign con If "Yes," go b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the transformation of the	n agreement was filed? assets of a foreign brar rporation? to to line 12b. ansferor a domestic coa branch that is a foreign brainue to line 12c. If "Netly after the transfer, foreign corporation? continue to line 12d. If "Netransferred loss amount insferor transfer proper ip Section C and questing assets."	rporation that transferrent disregarded entity) to lo," skip lines 12c and 1 was the domestic cordo," skip line 12d, and go included in gross incorty described in section 3	ed substa a specified 2d, and g poration o to line 1: ne as req	ntially all of the ed 10%-owned for to line 13. a U.S. shareho	assets of a foreign boreign corporation?	ranch Yes No
Section C - Inta	ngible Property Sub	ject to Section 367(d	l)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Ilemental Part III Information Required To Be Reported (see instructions)	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before 0.0000 % (b) After 0.0000 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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113-1	of transferor		Identifying number (see instruc		
	DBERT W. WOODRUFF ARTS CENTER, INC.	58-0633971	X No		
1	Is the transferee a specified 10%-owned foreign corporation that If the transferor was a corporation, complete questions 2a through		orporation? Yes	A NO	
2	If the transfer was a section 361(a) or (b) transfer, was the trans		on 369(a)) by		
а	five or fewer domestic corporations?	· ·		No	
h	Did the transferor remain in existence after the transfer?			No	
D	If not, list the controlling shareholder(s) and their identifying num				
	in not, list the controlling shareholder(s) and their identifying hum	per(s).			
	Controlling shareholder	ldent	tifying number		
С	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t		. —	☐ No	
	if flot, list the flame and employer identification flumber (Eliv) of t	ne 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 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such under s	section 367),	
	Name of partnership	EIN	of partnership		
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807		
b	Did the partner pick up its pro rata share of gain on the transfer of	f partnership assets?	Yes	X No	
	Is the partner disposing of its entire interest in the partnership?		Yes	X No	
	Is the partner disposing of an interest in a limited partnership	that is regularly traded on a		X No	
Par	securities market?	structions)			
4	Name of transferee (foreign corporation)	a doublib)	5a Identifying number,	if anv	
	KAPLAN FIPS		FOREIGNUS	' - '	
6	Address (including country)		5b Reference ID numbe		
	37-41, RUE DE ROCHER		(see instructions)		
	PARIS FR 75008				
7	Country code of country of incorporation or organization (see ins	tructions)			
	FR				
8	Foreign law characterization (see instructions)				
	CORPORATION				
9	Is the transferee foreign corporation a controlled foreign corporation	tion?	X Yes	No	

Part III Infor	mation Regardin	g Transfer of Property	(see instrud	ctions)		
Section A - Casl					7.0	
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022	2		2,184.		
lf "Yes," sk		Part III and go to Part IV.	orty oubject	ot to postion 3	067/4\\	X Yes No
	er Property (oth	er than intangible prop	erty subjec	(c) Section 3	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
2 a						
 Totals						
foreign corner of the street o	poration? to to line 12b. ansferor a domestical branch that is a fountinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) to If "No," skip lines 12c and er, was the domestic co	red substant of a specified 12d, and go or poration and go or go to line 13 or go to line as requ	atially all of the d 10%-owned for to line 13. a U.S. sharehod.	assets of a foreign boreign corporation?	ranch
Section C - Inta	ngible Property	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pric on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
- upp			
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 0.59978 % (b) After 0.59978 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$\bigs\\$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		77
	covered by section 367(e)(1)? See instructions	Yes	X No

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OMB No. 1545-0026

IIS T	of transferor		Identifying pymakas (a.a. isats	· ational
		Identifying number (see instructions)		
	DBERT W. WOODRUFF ARTS CENTER, INC.	58-0633971	X No	
1	Is the transferee a specified 10%-owned foreign corporation that If the transferor was a corporation, complete questions 2a through		orporation?	A NO
2	If the transfer was a section 361(a) or (b) transfer, was the trans		on 369(a)) by	
а	five or fewer domestic corporations?	•	` ''	No
h	Did the transferor remain in existence after the transfer?			No
D	If not, list the controlling shareholder(s) and their identifying num			
	in not, list the controlling shareholder(s) and their identifying hum	per(s).		
	Controlling shareholder	Ident	tifying number	
С	If the transferor was a member of an affiliated group filing a			□ No
	corporation? If not, list the name and employer identification number (EIN) of t	he parent corporation.		
	Name of mount communica	FINE C		
	Name of parent corporation	EIN OF P	parent corporation	
d	Have basis adjustments under section 367(a)(4) been made?		Yes	□ No
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such under	section 367),
	Name of partnership	FIN	of partnership	
	·		•	
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807	
h	Did the partner pick up its pro rata share of gain on the transfer of	uf nartnershin assets?	Yes	X No
	Is the partner disposing of its entire interest in the partnership?		Yes	
	Is the partner disposing of an interest in a limited partnership			22 140
-	securities market?	0 ,		X No
Par		structions)		
4	Name of transferee (foreign corporation)	,	5a Identifying number	, if any
	BPI FRANCE HEXAGONE 2 FPCI		FOREIGNUS	3
6	Address (including country)		5b Reference ID number	
	27-31 AV. DU GENERAL LECLERC		(see instructions)	
	MAISONS-ALFORT FR 94710			
7	Country code of country of incorporation or organization (see ins	structions)		
	FR			
8	Foreign law characterization (see instructions)			
	CORPORATION			
9	Is the transferee foreign corporation a controlled foreign corporation	tion?	X Yes	No

		g Transfer of Property	(see instru	ctions)		
Section A - Cas					7.0	
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022	2		11,821.		
lf "Yes," sk		Part III and go to Part IV.				X Yes No
	er Property (oth	er than intangible prop	erty subje	(c) Section 3	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Duiit-iii 1055						
 Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	poration? to to line 12b. ansferor a domestical branch that is a footntinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) to f "No," skip lines 12c and er, was the domestic co? If "No," skip line 12d, and ount included in gross incorperty described in section estions 14a through 15.	red substar o a specified 12d, and go prporation a go to line 13 ome as requ	ntially all of the d 10%-owned fo o to line 13. a U.S. shareho 	assets of a foreign boreign corporation?	ranch
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
	· · · · · · · · · · · · · · · · · · ·		
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) Before0.00000 % (b) After0.24234% 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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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OMB No. 1545-0026

Par	t I U.S. Transferor Information (see instructions)		
Name	e of transferor		Identifying number (see instructions)
_R(DBERT W. WOODRUFF ARTS CENTER, INC.		58-0633971
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? Yes X No
2	If the transferor was a corporation, complete questions 2a through	-	
а	If the transfer was a section 361(a) or (b) transfer, was the trans		
	five or fewer domestic corporations?		
b	Did the transferor remain in existence after the transfer?		Yes
	If not, list the controlling shareholder(s) and their identifying num	ber(s).	
	Controlling shareholder	Ident	tifying number
С	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t		it the parent
	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 a complete questions 3a through 3d.	actual transferor (but is not	treated as such under section 367),
a	List the name and EIN of the transferor's partnership.	T	
	Name of partnership	EIN	of partnership
MO1	NTAUK TRIGUARD FUND VII, LP	82-	2829807
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?	Yes X No
С	Is the partner disposing of its entire interest in the partnership?		Yes X No
d	Is the partner disposing of an interest in a limited partnership	3	
	securities market?		Yes X No
Par	Transferee Foreign Corporation Information (see ins	structions)	
4	Name of transferee (foreign corporation)		5a Identifying number, if any
	CAM VC EU PLUS-CONTINUATION		FOREIGNUS
6	Address (including country)		5b Reference ID number (see instructions)
	5 HEIENHAFF		(SOC ITISH GOHOLIS)
_	SENNINGERBERG LU L-1736 Country code of country of incorporation or organization (see ins	atructions)	
7		Structions)	
0	Euroign law characterization (and instructions)		
8	Foreign law characterization (see instructions)		
	CORPORATION	tion?	77 V
9	Is the transferee foreign corporation a controlled foreign corporation	uon?	X Yes No

		g Transfer of Property	(see instruc	tions)		
Section A - Casl		(6)		(2)	(4)	(2)
Type of property	(a) Date of transfer	(b) Description of property	I	(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022	2		7,785.		
lf "Yes," sk		ansferred? Part III and go to Part IV. er than intangible prop	orty oubica		27/4\\	X Yes No
Type of property	(a) Date of	(b) Description of	Fair ma	(c) rket value on	(d) Cost or other	(e) Gain recognized on
Stock and securities	transfer	property	date	of transfer	basis	transfer
Inventory						
inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign corner of the street o	poration? to to line 12b. ansferor a domestical branch that is a fountinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer products.	c corporation that transfer reign disregarded entity) t If "No," skip lines 12c and er, was the domestic co	h that is a fo	tially all of the at 10%-owned for U.S. sharehold ired under section	ed entity) transferre assets of a foreign b reign corporation? der with respect t	d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
. .	Additional Information Deposition Transfer of Deposits (and 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.		
10	(a) Before 0.0000 % (b) After 0.59833 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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OMB No. 1545-0026

IIS T			lala matificia a morana ha a s	a a a linaturati			
	ne of transferor			Identifying number (see instructions) 58-0633971			
	DBERT W. WOODRUFF ARTS CENTER, INC.	the section of the section of			X No		
1	Is the transferee a specified 10%-owned foreign corporation that If the transferor was a corporation, complete questions 2a through		orporation? L	Yes	A NO		
2	If the transfer was a section 361(a) or (b) transfer, was the trans		on 369(a)) by				
а	five or fewer domestic corporations?	· ·	· // •	Yes	No		
h	Did the transferor remain in existence after the transfer?			Yes	No		
D	If not, list the controlling shareholder(s) and their identifying num			162			
	in not, list the controlling shareholder(s) and their identifying hum	per(s).					
	Controlling shareholder	Ident	ifying number				
	If the transferor was a member of an affiliated group filing a	a consolidated rature was	it the nevent				
С	corporation? If not, list the name and employer identification number (EIN) of t			Yes	☐ No		
	Name of parent corporation	EIN of p	arent corporatio	n			
d	Have basis adjustments under section 367(a)(4) been made?		L	Yes	□ No		
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection 367),		
	Name of partnership	EIN	of partnership				
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807				
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X No		
	Is the partner disposing of its entire interest in the partnership?			Yes	X No		
	Is the partner disposing of an interest in a limited partnership	that is regularly traded on a		Yes	X No		
Par	securities market?	structions)			22 110		
4	Name of transferee (foreign corporation)	,	5a Identifying r	umber, if	any		
	G.K. BCJ-51		FORE		,		
6	Address (including country)		5b Reference II	number			
	5/F, PALACE BUILDING 1-1-1 MARUNOUCHI, CHIYODA-KU		(see instruction	s)			
	TOKYO JA 100-0005						
7	Country code of country of incorporation or organization (see ins	tructions)					
	JA						
8	Foreign law characterization (see instructions)						
	CORPORATION						
9	Is the transferee foreign corporation a controlled foreign corporation	tion?	<u> </u>	Yes	X No		

Part III Infor	mation Regardin	g Transfer of Property	(see instru	ctions)		
Section A - Cas						
Type of property	(a) Date of transfer	(b) Description of property	I	(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	10/25/2022	2		138.		
lf "Yes," sk		Part III and go to Part IV.			007/40	X Yes No
	er Property (oth (a)	er than intangible prop	erty subje	ct to section 3	(d)	(e)
Type of property	Date of transfer	Description of property	I	arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
built iii ioss						
 Totals						
foreign cor If "Yes," go b Was the trace (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t	poration? to to line 12b. ansferor a domestical branch that is a footninue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) t If "No," skip lines 12c and er, was the domestic co	rred substants a specifie 12d, and gorporation go to line 13 ome as required.	ntially all of the d 10%-owned for to line 13. a U.S. sharehows.	assets of a foreign boreign corporation?	ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length pric on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
гагі	Additional information regarding transfer of Froperty (300 mattactions)		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
	(a) Before 0.00000 % (b) After 0.00005 %		
17	Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.	Yes	X No
h			
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		
C	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	162	_Z <u>X</u> 14U
~ '	covered by section 367(e)(1)? See instructions	Yes	X No
	50.00.00 j 500.00 (0)(1). 000 mondono j j j j j j j j j j j j j j j j j j		

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OMB No. 1545-0026

Par								
Name	ame of transferor			Identifying number (see instructions)				
_RC	BERT W. WOODRUFF ARTS CENTER, INC.	58-0633971						
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? L	Yes	X No			
2	If the transferor was a corporation, complete questions 2a through	gh 2d.						
а	If the transfer was a section 361(a) or (b) transfer, was the trans	sferor controlled (under section	on 368(c)) by	_				
	five or fewer domestic corporations?	•	` ''	Yes	No			
h	Did the transferor remain in existence after the transfer?			Yes	No			
D	If not, list the controlling shareholder(s) and their identifying num			103				
	in not, list the controlling shareholder(s) and their identifying hum	Dei (S).						
	Controlling shareholder	ldent	tifying number					
С	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of t			Yes	☐ No			
	Name of parent corporation		parent corporation					
	Have basis adjustments under section 367(a)(4) been made?			Yes	No			
u	nave basis adjustifients under section 307 (a)(4) been made:			res	□ NO			
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such u	ınder se	ection 367),			
		FIN						
	Name of partnership	EIN	of partnership					
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807					
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X No			
С	Is the partner disposing of its entire interest in the partnership?			Yes	X No			
	Is the partner disposing of an interest in a limited partnership		an established					
	securities market?			Yes	X No			
Par		structions)						
4	Name of transferee (foreign corporation)	,	5a Identifying nu	mber. if	anv			
	GRANITE FRANCE HOLDCO SAS		FOREI		,			
6	Address (including country)		5b Reference ID					
_	3-5 RUE SAINT-GEORGES		(see instructions)					
7	PARIS FR 75008 Country code of country of incorporation or organization (see ins	structions)						
•		a double)						
0	FR							
8	Foreign law characterization (see instructions)							
	CORPORATION	Wa0	ı	1 1/	T **			
9	Is the transferee foreign corporation a controlled foreign corporation	uon?		Yes	X No			

		g Transfer of Property	(see instruc	ctions)		
Section A - Cas		(6)		(a)	(4)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	07/20/2022	2		60.		
If "Yes," s	•	Part III and go to Part IV.			07(4))	X Yes No
	ner Property (oth	er than intangible prop	erty subjec	(c) Section 30	(d)	(e)
Type of property	Date of transfer	Description of property		of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign con If "Yes," grown b Was the transferee If "Yes," or d Enter the fall and the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the transferee If "Yes," or d I was a subject to the	rporation? o to line 12b. ransferor a domestic a branch that is a forantinue to line 12c. ely after the transferorign corporation ontinue to line 12d. transferred loss amountsferor transfer pro-	c corporation that transfer reign disregarded entity) t If "No," skip lines 12c and er, was the domestic co	h that is a formal red substant to a specified 12d, and go orporation a go to line 13 ome as required.	tially all of the at 10%-owned for the toline 13. a U.S. sharehol	ed entity) transferre assets of a foreign b reign corporation? Ider with respect t	d to a Yes No ranch Yes No
Section C - Inta	angible Property	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
 Totals					1	

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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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Didemental Part III Information Required To Be Reported (see instructions)	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes Yes	X No X No X No X No X No X No
c 21	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 Yes	X No

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

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OMB No. 1545-0026

Par								
Name	ame of transferor			Identifying number (see instructions)				
_RC	BERT W. WOODRUFF ARTS CENTER, INC.	58-0633971						
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? L	Yes	X No			
2	If the transferor was a corporation, complete questions 2a through	gh 2d.						
а	If the transfer was a section 361(a) or (b) transfer, was the trans		on 368(c)) by					
	five or fewer domestic corporations?	•	` '' •	Yes	No			
h	Did the transferor remain in existence after the transfer?			Yes	No			
	If not, list the controlling shareholder(s) and their identifying numl							
	in not, list the controlling shareholder(s) and their identifying humb	per(s).						
	Controlling shareholder	ldent	ifying number					
С	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of the state of the corporation is a second of the corporation.		• —	Yes	☐ No			
	Name of parent corporation		arent corporation					
				1				
d	Have basis adjustments under section 367(a)(4) been made?			Yes	∟ No			
3 a	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such t	ınder se	ection 367),			
		FIN	-ft					
	Name of partnership	EIN	of partnership					
MON	NTAUK TRIGUARD FUND VII, LP	82-	2829807					
b	Did the partner pick up its pro rata share of gain on the transfer of	f partnership assets?		Yes	X No			
С	Is the partner disposing of its entire interest in the partnership?			Yes	X No			
	Is the partner disposing of an interest in a limited partnership		an established					
	securities market?			Yes	X No			
Par		tructions)						
4	Name of transferee (foreign corporation)		5a Identifying nu	mber, if	any			
	PROPULSION (BC) TOPCO SARL		FOREI(GNUS	•			
6	Address (including country)		5b Reference ID					
	4 RUE LOU HEMMER		(see instructions)					
	SENNINGERBERG LU L-1748							
7	Country code of country of incorporation or organization (see ins	structions)						
-	LU	,						
8	Foreign law characterization (see instructions)							
•	CORPORATION							
9	Is the transferee foreign corporation a controlled foreign corporat	tion?		Yes	X No			
<u> </u>	To the transfered foreign corporation a controlled foreign corporati	uo		162	INU			

		g Transfer of Property	(see instruc	tions)		
Section A - Casl		(6)		(a)	(4)	(0)
Type of property	(a) Date of transfer	(b) Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	09/15/202			71.		
lf "Yes," sk		Part III and go to Part IV.				X Yes No
		er than intangible prop	erty subjec		· //	(0)
Type of property	(a) Date of transfer	(b) Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Proporty with						
Property with built-in loss						
Totals						
foreign cor If "Yes," go b Was the trace (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t	poration? to to line 12b. ansferor a domesti a branch that is a forentinue to line 12c. ly after the transfereign corporation ontinue to line 12d. ransferred loss am ansferor transfer pro-	branch (including a branch c corporation that transfer oreign disregarded entity) to If "No," skip lines 12c and er, was the domestic co	rred substant o a specified 12d, and go orporation a go to line 13.	reign disregarde	d entity) transferred seets of a foreign beign corporation?	d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
 Totals						
					•	

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?	Yes Yes Yes	No No No
	• • • • • • • • • • • • • • • • • • • •		
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) Before0.00000 % (b) After0.00068% Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351		
17 18	Indicate whether any transfer reported in Part III is subject to any of the following.		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
C	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	J J J J J J J J J J J J J J J J J J J		
	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21		Yes	X No

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Hama			Identifican manushan	/ ! 4 4 !				
	nne of transferor			Identifying number (see instructions)				
	BERT W. WOODRUFF ARTS CENTER, INC.		58-06339		37	l		
1	Is the transferee a specified 10%-owned foreign corporation that	•	orporation? L	Yes	X	No		
	If the transferor was a corporation, complete questions 2a through		000()) !					
	If the transfer was a section 361(a) or (b) transfer, was the transfer was					 .		
	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 num	per(s).						
	Controlling shareholder	ldent	ifying number					
	If the transferor was a member of an affiliated group filing a	a consolidated return was	it the parent					
	corporation? If not, list the name and employer identification number (EIN) of t		. г	Yes		No		
	Name of parent corporation	EIN of p	arent corporatio	n				
d	Have basis adjustments under section 367(a)(4) been made?			Yes		No		
	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such	under se	ection	367),		
	Name of partnership	EIN	of partnership					
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807					
	Did the partner pick up its pro rata share of gain on the transfer of			Yes	Х	No		
С	Is the partner disposing of its $\mbox{\bf entire}$ interest in the partnership? \Box		L	Yes	X	No		
	Is the partner disposing of an interest in a limited partnership securities market?			Yes	X	No		
Par		tructions)						
4	Name of transferee (foreign corporation)		5a Identifying		any			
	POSEIDON HOLDCO			<u>IGNUS</u>				
6	Address (including country)		5b Reference II (see instruction					
	12 PLACE DAUPHINE		(300 การถนบเปก	,				
7	PARIS FR 75001 Country code of country of incorporation or organization (see ins	tructions)						
7		u uolions)						
8	FR Foreign law characterization (see instructions)							
J	,							
9	CORPORATION Is the transferee foreign corporation a controlled foreign corporation.	tion?		X Yes		No		
	5 · · F - · · · · · · · · · · · · · ·							

		g Transfer of Property	(see instru	ctions)		
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
 Cash	09/27/2022		uate	46.	Dasis	transier
10 Was cash If "Yes," sk	the only property tra	ansferred? Part III and go to Part IV.			07(1)	X Yes No
	er Property (oth	er than intangible prop	erty subje	ct to section 30	67(d)) (d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign corner of the street o	poration? to to line 12b. ansferor a domestical branch that is a fountinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) to If "No," skip lines 12c and er, was the domestic co	red substar o a specified 12d, and gorporation go to line 13	oreign disregard ntially all of the a d 10%-owned fo o to line 13. a U.S. sharehol	ed entity) transferred assets of a foreign be reign corporation?	ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Tatala						
Totals						

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?	Yes Yes Yes	No No No
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.		
10	(a) Before 0.0000 % (b) After 0.0008 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) \$\bigs\\$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the	□ va-	X No
24	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	Yes	LA NO
21		Vac	X No
	covered by section 367(e)(1)? See instructions	Yes	X No

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Par					
Name	of transferor		Identifying number (s		ons)
RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-063397	1	
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation?	Yes	X No
2	If the transferor was a corporation, complete questions 2a through	gh 2d.			
а	If the transfer was a section 361(a) or (b) transfer, was the trans	sferor controlled (under section	on 368(c)) by	_	
	five or fewer domestic corporations?			Yes	No
b Did the transferor remain in existence after the transfer?					
	If not, list the controlling shareholder(s) and their identifying numl				
	, , , , , , , , , , , , , , , , , , , ,	()			
	Controlling shareholder	Ident	ifying number		
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of to the name of parent corporation. Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No
_	If the transferred was a manker in a manker police that was the				-4: 007\
3	If the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such t	inder se	ction 307)
_	complete questions 3a through 3d.				
a	List the name and EIN of the transferor's partnership.				
	Name of partnership	EIN	of partnership		
MON	TAUK TRIGUARD FUND VII, LP	82-	2829807		
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?		Yes	X No
С	Is the partner disposing of its entire interest in the partnership?			Yes	X No
d	Is the partner disposing of an interest in a limited partnership	that is regularly traded on a	an established		
	securities market?			Yes	X No
Par		structions)			
4	Name of transferee (foreign corporation)		5a Identifying nu	ımber, if	any
	VILLA DUTCH HOLDCO B.V.		FOREI	GNUS	
6	Address (including country)		5b Reference ID	number	
	STRAWINSKYLAAN 1209		(see instructions)	
	AMSTERDAM NL 1077XX				
7	Country code of country of incorporation or organization (see ins	structions)	<u> </u>		
	NL				
8	Foreign law characterization (see instructions)				
	CORPORATION				
9	Is the transferee foreign corporation a controlled foreign corporation	tion?		Yes	X No

		ng Transfer of Property	(see instru	ctions)		
Section A - Casl		(6)		(2)	(4)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	11/03/202			64.		
If "Yes," sk	ip the remainder o	ansferred? f Part III and go to Part IV. ner than intangible pro	perty subje	ct to section 3	67(d))	X Yes No
Type of property	(a) Date of transfer	(b) Description of property	Fair m	(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities		F12F13				
Inventory						
Other property (not listed under another category)						
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 13 Did the trai	poration? to to line 12b. ansferor a domest be branch that is a foottinue to line 12c. ly after the transforeign corporation ontinue to line 12d. ransferred loss am nsferor transfer pr	branch (including a branch ic corporation that transfer oreign disregarded entity) If "No," skip lines 12c and fer, was the domestic of the included in gross incorporate described in section destions 14a through 15.	erred substar to a specified d 12d, and gr corporation a d go to line 13 come as requ	ntially all of the of 10%-owned for to line 13. a U.S. shareho i.ired under secti	assets of a foreign boreign corporation? Ider with respect to the control on 91 ▶\$	oranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	7(d)			T
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
 Totals						

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?	Yes Yes Yes	No No No
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.		
47	(a) Before 0.00000 % (b) After 0.00038 %		
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. Gain recognition under section 904(f)(3)	Yes	X No
a b		Yes	X No
C	Gain recognition under section 904(f)(5)(F)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
		Yes	X No
24	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	1 e3	I10
21	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		

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

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OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)	•	
Name	of transferor		Identifying number (see instructions)
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971
1	Is the transferee a specified 10%-owned foreign corporation that		orporation? Yes X No
2	If the transferor was a corporation, complete questions 2a through		000(-))
а	If the transfer was a section 361(a) or (b) transfer, was the transfer, or force demonstrated accompanies.	·	* * * *
h	five or fewer domestic corporations? Did the transferor remain in existence after the transfer?		
D	If not, list the controlling shareholder(s) and their identifying num		
	Controlling shareholder	Iden	tifying number
С	If the transferor was a member of an affiliated group filing corporation?		
	corporation? If not, list the name and employer identification number (EIN) of t	he 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 a 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
	MONTAUK TRIGUARD FUND VII, LP	82-	2829807
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?	Yes X No
С	Is the partner disposing of its $\ensuremath{\textbf{entire}}$ interest in the partnership? .		
d	Is the partner disposing of an interest in a limited partnership		
_	securities market?	((°)	Yes X No
Par	Transferee Foreign Corporation Information (see instance of transferee (foreign corporation)	structions)	Es Identificing number if one
4	PHOENIX TOWER INTERNATIONAL IBERICA	TT 0.0770	5a Identifying number, if any
6	Address (including country)	II EIVE	FOREIGNUS 5b Reference ID number (see instructions)
	C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154		
7	Country code of country of incorporation or organization (see ins	tructions)	
8	Foreign law characterization (see instructions)		
	RPORATION	ui 2	[]
9	Is the transferee foreign corporation a controlled foreign corpora	uon.	X Yes No

		g Transfer of Property	(see instruc	ctions)		
Section A - Casl		/h)		(2)	(4)	(2)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022	2		20.		
lf "Yes," sk		nnsferred? Part III and go to Part IV. er than intangible prop	orty oubject	ot to coation 2		X Yes No
	er Property (oth	er than intangible prop	erty Subjec	(c)	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign corner of the street o	poration? to to line 12b. ansferor a domestical branch that is a fountinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) t If "No," skip lines 12c and er, was the domestic co	rred substan o a specified 12d, and go orporation a go to line 13 ome as requ	tially all of the all 10%-owned for the line 13. a U.S. sharehold in the line with the line	led entity) transferre assets of a foreign b breign corporation? Ider with respect t on 91 ►\$	d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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?	Yes Yes Yes	No No No
. .	Additional Information Deposition Transfer of December (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.		
10	(a) Before 0.00053 % (b) After 0.00053 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a		Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) > \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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OMB No. 1545-0026

Par	U.S. Transferor Information (see instructions)		•	_
Name	of transferor		Identifying number (see instructions)	_
RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971	
1	Is the transferee a specified 10%-owned foreign corporation tha	t is not a controlled foreign c	orporation? Yes X No	_
2	If the transferor was a corporation, complete questions 2a through			
а	If the transfer was a section 361(a) or (b) transfer, was the trans		on 368(c)) by	
	five or fewer domestic corporations?	·		
h	Did the transferor remain in existence after the transfer?			
-	If not, list the controlling shareholder(s) and their identifying num			
	The time the controlling charenesses (c) and their lacining ham	201(0).		
	Controlling shareholder	Iden	tifying 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 second seco			_
			_	_
	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 a complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	actual transferor (but is not	treated as such under section 367	'),
a				_
	Name of partnership	EIN	of partnership	
MON	TAUK TRIGUARD FUND VII, LP			
b	Did the partner pick up its pro rata share of gain on the transfer of	of partnership assets?	Yes X No	_
С	Is the partner disposing of its entire interest in the partnership?		Yes X No	
d	Is the partner disposing of an interest in a limited partnership			
	securities market?		Yes X No	_
Par	Transferee Foreign Corporation Information (see ins	structions)		
4	Name of transferee (foreign corporation)		5a Identifying number, if any	
	FUSION TOPCO LIMITED		FOREIGNUS	
6	Address (including country)		5b Reference ID number	_
	11-15 SEATON PLACE		(see instructions)	
	ST HELIER JE JE4 OQH			
7	Country code of country of incorporation or organization (see ins	structions)		_
	JE			
8	Foreign law characterization (see instructions)			
	CORPORATION			_
9	Is the transferee foreign corporation a controlled foreign corpora	tion?	Yes X No	_

		g Transfer of Property	(see instruc	tions)		
Section A - Casl		(6)		(5)	(4)	(2)
Type of property	(a) Date of transfer	(b) Description of property		(c) rket value on of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022	2		42.		
lf "Yes," sk		Part III and go to Part IV.	outs oubject			X Yes No
	er Property (oth	er than intangible prop	erty subjec	(c) section 30	(d)	(e)
Type of property	Date of transfer	Description of property		rket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign corner of the street o	poration? to to line 12b. ansferor a domestical branch that is a fountinue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) t If "No," skip lines 12c and er, was the domestic co	rred substant o a specified 12d, and go orporation a go to line 13.	tially all of the at 10%-owned for to line 13. U.S. sharehol	ed entity) transferre assets of a foreign b reign corporation? der with respect t	d to a Yes No ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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? At the time of the transfer, did any of the transferred intangible property have an indefinite useful life? Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property? If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)? Diemental Part III Information Required To Be Reported (see instructions)	Yes Yes Yes	No No No
Dort	IV Additional Information Regarding Transfer of Property (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 0.00000 % (b) After 0.00032 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) Significant the demonstration part recognized gain or loss on the distribution of property because the		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	res	LA_ NO
4 I	covered by section 367(e)(1)? See instructions	Yes	X No
	covered by section cor(c)(1): Oce matractions	169	<u> </u>

(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

Part I U.S. Transferor Information (see instructions)	
Name of transferor	Identifying number (see instructions)
ROBERT W. WOODRUFF ARTS CENTER, INC.	58-0633971
1 Is the transferee a specified 10%-owned foreign corporation	that is not a controlled foreign corporation? \square Yes \square No
2 If the transferor was a corporation, complete questions 2a thr	ough 2d.
a If the transfer was a section 361(a) or (b) transfer, was the tr	ansferor controlled (under section 368(c)) by
five or fewer domestic corporations?	
b Did the transferor remain in existence after the transfer?	Yes No
If not, list the controlling shareholder(s) and their identifying n	umber(s).
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filin	g a consolidated return, was it the parent
corporation?	Yes No
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 th	e actual transferor (but is not treated as such under section 36)
complete questions 3a through 3d.	a detail transfer (but to flot treated as each under section of
a List the name and EIN of the transferor's partnership.	
Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807
b Did the partner pick up its pro rata share of gain on the transfe	er of partnership assets? Yes X No
c Is the partner disposing of its entire interest in the partnership	
d Is the partner disposing of an interest in a limited partnersh	
securities market?	
Part Transferee Foreign Corporation Information (see	instructions)
4 Name of transferee (foreign corporation)	5a Identifying number, if any
HEIMDALL LUXEMBOURG HOLDINGS II SA	
6 Address (including country)	5b Reference ID number
5, PLACE DE LA GARE	(see instructions)
LUXEMBOURG LU L-1616	
7 Country code of country of incorporation or organization (see	instructions)
LU	
8 Foreign law characterization (see instructions)	
CORPORATION	
9 Is the transferee foreign corporation a controlled foreign corporation	oration? Yes X No

	mation Regarding Tr	anster of Property (see instru	ctions)		
Section A - Cas	n (a)	(b)		(c)	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Cash	SEE STATEMENT	1 14				
	the only property transfe cip the remainder of Part					X Yes No
Section B - Oth	er Property (other t		rty subje			
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
Totals						
foreign cor foreign cor If "Yes," go b Was the tr (including If "Yes," co c Immediate transferee If "Yes," co d Enter the t	n agreement was filed? assets of a foreign bran poration? to to line 12b. ansferor a domestic co a branch that is a foreig ontinue to line 12c. If "N ly after the transfer, of foreign corporation? ontinue to line 12d. If "N ransferred loss amount insferor transfer propert p Section C and question	rporation that transferrent disregarded entity) to o," skip lines 12c and was the domestic corporation," skip line 12d, and go included in gross incorpy described in section 3	ed substar a specifie 12d, and g poration to line 13 me as requ	oreign disregarde ntially all of the a d 10%-owned for o to line 13. a U.S. sharehold	ed entity) transferred ssets of a foreign b eign corporation? der with respect to	d to a Yes No ranch Yes No
Section C - Inta	ngible Property Sub	ject to Section 367(c	i)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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b c d	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) > \$	Yes Yes	No No No
15	Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?	Yes	☐ No
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.		
	(a) Before 0.00000 % (b) After 0.00164 %		
17	Type of nonrecognition transaction (see instructions) ►		
18	Indicate whether any transfer reported in Part III is subject to any of the following.		37
a	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	
C	Recapture under section 1503(d)	Yes	
d	Exchange gain under section 987	Yes	
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) Signature of the description and the distribution of the section of the s		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		X No
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	LX NO
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		77
	covered by section 367(e)(1)? See instructions	Yes	X No

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Department of the Treasury Internal Revenue Service

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

OMB No. 1545-0026

Attachment Sequence No. 128

Par							
Name	of transferor		Identifying number (see instructions)				
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-0633971				
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? L	Yes	X No		
2	If the transferor was a corporation, complete questions 2a through	gh 2d.					
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 num						
	Controlling shareholder	Ident	ifying number				
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of to the name of parent corporation Have basis adjustments under section 367(a)(4) been made?	he parent corporation.	arent corporation	Yes	□ No		
u	Trave basis adjustifients under section 507(a)(4) been made:			_ 1 C S	□ NO		
3	If the transferor was a partner in a partnership that was the a	actual transferor (but is not	treated as such	under se	ction 367)		
	complete questions 3a through 3d.						
а	List the name and EIN of the transferor's partnership.						
	Name of partnership	FIN	of partnership				
	·						
MON	NTAUK TRIGUARD FUND VII, LP	82-	2829807				
	Did the partner pick up its pro rata share of gain on the transfer o	of partnership assets?		Yes	X No		
	Is the partner disposing of its entire interest in the partnership?			+			
				Yes	X No		
a	Is the partner disposing of an interest in a limited partnership to			\ V	X No		
Do	securities market?	etructions)		Yes	X		
Par	Name of transferee (foreign corporation)	structions)	E. I.I. die i				
4	,		5a Identifying nu		any		
	RISE INVESTMENTS SARL		FOREI				
6	Address (including country)		5b Reference ID				
	53, BOULEVARD ROYAL		(see instructions	,			
	LUXEMBOURG LU L-2449						
7	Country code of country of incorporation or organization (see ins	structions)					
	LU						
8	Foreign law characterization (see instructions)		<u></u>				
	CORPORATION						
9	Is the transferee foreign corporation a controlled foreign corporation	tion?		Yes	X No		

Part III Infor	mation Regardin	g Transfer of Property	(see instru	ctions)		
Section A - Casl		6)				
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	09/29/2022	2		155.		
lf "Yes," sk		Part III and go to Part IV.				X Yes No
	er Property (oth	er than intangible prop	erty subje	(c) Section 3	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
2 a						
Totals						
foreign corner of the street o	poration? to to line 12b. ansferor a domestical branch that is a footninue to line 12c. If after the transforeign corporation on tinue to line 12d. Transferred loss amonsferor transfer pro-	c corporation that transfer reign disregarded entity) to If "No," skip lines 12c and er, was the domestic co	red substar o a specified 12d, and go orporation a go to line 13 ome as requ	ntially all of the d 10%-owned for to line 13. a U.S. shareho	assets of a foreign boreign corporation?	ranch
Section C - Inta	ngible Property	Subject to Section 367((d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfe		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
Totals						

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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?	Yes Yes Yes	No No No
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 0.59372 % (b) After 0.59372 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions.	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$ Did the domestic corporation not recognize gain or loss on the distribution of property because the		
С	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation	162	LAT INO
۱ ۵	covered by section 367(e)(1)? See instructions	Yes	X No
	covered by cocalon cor(c)(1): occ man denoted		22 110

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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

Par						
Name	of transferor		Identifying number (see instructions)			
_RC	BERT W. WOODRUFF ARTS CENTER, INC.		58-063397	1		
1	Is the transferee a specified 10%-owned foreign corporation that	t is not a controlled foreign co	orporation? L	Yes	X No	
2	If the transferor was a corporation, complete questions 2a through	gh 2d.				
а	If the transfer was a section 361(a) or (b) transfer, was the trans	feror controlled (under section	on 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 numl					
	, , , , , , , , , , , , , , , , , , , ,					
	Controlling shareholder	ldent	ifying number			
	If the transferor was a member of an affiliated group filing a corporation? If not, list the name and employer identification number (EIN) of to the name of parent corporation. Have basis adjustments under section 367(a)(4) been made?	he parent corporation. EIN of p	parent corporation	Yes	□ No	
3	If the transferor was a partner in a partnership that was the a complete questions 3a through 3d.	actual transferor (but is not	treated as such	under se	ection 367)	
a	List the name and EIN of the transferor's partnership.					
	Name of partnership	EIN	of partnership			
TIG	GER GLOBAL, LP	13-	4165054			
b	Did the partner pick up its pro rata share of gain on the transfer of	f partnership assets?		Yes	X No	
С	Is the partner disposing of its entire interest in the partnership?			Yes	X No	
d	Is the partner disposing of an interest in a limited partnership	that is regularly traded on a	an established	_		
	securities market?			Yes	X No	
Par		structions)				
4	Name of transferee (foreign corporation)		5a Identifying nu	umber, if	any	
	TIGER GLOBAL C, LTD		98-16	31655	-	
6	Address (including country)		5b Reference ID			
	C/O CAMPBELLS CORPORATE SERVICES LTD, FLOOR 4, WILLOW		(see instructions			
	GRAND CAYMAN CJ KY1-9010					
7	Country code of country of incorporation or organization (see ins	tructions)	<u> </u>			
-	CJ	,				
8	Foreign law characterization (see instructions)					
•	,					
9	CORPORATION Is the transferee foreign corporation a controlled foreign corporat	tion?		Yes	X No	
<u> </u>			<u> </u>	169	LA NO	

Part Infor		ng Transfer of Property	(see instru	ctions)		
Type of	(a)	(b)		(c)	(d)	(e)
property	Date of transfer	Description of property		arket value on e of transfer	Cost or other basis	Gain recognized on transfer
Cash	11/04/202		duit	105,600.	basis	transisi
If "Yes," sk	rip the remainder o	ansferred? f Part III and go to Part IV.				X Yes No
	er Property (otr	ner than intangible prop	perty subject	(c) Section 3	(d)	(e)
Type of property	Date of transfer	Description of property		arket value on of transfer	Cost or other basis	Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with						
built-in loss						
Totals						
foreign cor If "Yes," go b Was the tra (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t 13 Did the tra	poration? to to line 12b. ansferor a domest branch that is a foottinue to line 12c. ly after the transforeign corporation ontinue to line 12d. ransferred loss an nsferor transfer pr	branch (including a branch branch (including a branch branch breign disregarded entity) If "No," skip lines 12c and fer, was the domestic of the count included in gross incoperty described in section uestions 14a through 15.	erred substar to a specified d 12d, and gr corporation a d go to line 13 come as requ	ntially all of the add 10%-owned for to line 13. a U.S. sharehows.	assets of a foreign breign corporation? Ider with respect to the corporation on 91 • \$	ranch Yes No
Section C - Inta	ngible Property	Subject to Section 367	′(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer		(f) Income inclusion for year of transfer (see instructions)
Property described						
in sec. 367(d)(4)						
			+			
			+			
Totals						

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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?	Yes Yes Yes	No No No
Jupp	Temental Fart III III of mation Required To be Reported (300 III 31 dottors)		
Part	Additional Information Regarding Transfer of Property (see instructions)		
· art	name of the state		
16	Enter the transferor's interest in the transferee foreign corporation before and after the transfer.		
. •	(a) Before 0.00000 % (b) After 0.13312 %		
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	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X No
С	Recapture under section 1503(d)	Yes	X No
d	Exchange gain under section 987	Yes	X No
19	Did this transfer result from a change in entity classification?	Yes	X No
20 a	Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions	Yes	X No
	If "Yes," complete lines 20b and 20c.		
b	Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ▶ \$		
С	Did the domestic corporation not recognize gain or loss on the distribution of property because the		
	property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?	Yes	X No
21	Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation		
	covered by section 367(e)(1)? See instructions	Yes	X No

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Department of the Treasury Internal Revenue Service

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

OMB No. 1545-0026

Attachment Sequence No. 128

Par						
Name	of transferor	Identifying number (see instructions)				
RC	DBERT W. WOODRUFF ARTS CENTER, INC.	58-063397	71			
1	Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign co	orporation?	Yes	X N	О	
2	If the transferor was a corporation, complete questions 2a through 2d.	•				
а	If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section	on 368(c)) by				
-	five or fewer domestic corporations?					
h	Did the transferor remain in existence after the transfer?		Yes		lo	
D			162	IN	U	
	If not, list the controlling shareholder(s) and their identifying number(s).					
	Controlling shareholder Ident	ifying number				
С	If the transferor was a member of an affiliated group filing a consolidated return, was corporation? If not, list the name and employer identification number (EIN) of the parent corporation.		Yes	N	io	
	Name of parent corporation EIN of p	arent corporation	n			
d	Have basis adjustments under section 367(a)(4) been made?		Yes	N	lo	
3 a	If the transferor was a partner in a partnership that was the actual transferor (but is not complete questions 3a through 3d. List the name and EIN of the transferor's partnership.	treated as such	under se	ection 30	67),	
		of partnership				
	Did the newton with on the present shows of new or the transfer of newton white		V			
	Did the partner pick up its pro rata share of gain on the transfer of partnership assets?		Yes	N		
	Is the partner disposing of its entire interest in the partnership?		Yes	N	lo	
d	Is the partner disposing of an interest in a limited partnership that is regularly traded on a		\neg			
	securities market?		Yes	N	lo	
Par	Transferee Foreign Corporation Information (see instructions)					
4	Name of transferee (foreign corporation) 5a Identifying number, if any					
	CLAYTON, DUBILIER & RICE FUND X (CREDIT), LP 98-1446590					
6	Address (including country)	5b Reference ID	number			
	PO BOX 309, UGLAND HOUSE (see instructions)					
	GRAND CAYMAN CJ KY1-1104					
7	Country code of country of incorporation or organization (see instructions)	<u> </u>				
•						
•	CJ Foreign law characterization (see instructions)					
8						
	CORPORATION		1,,			
9	Is the transferee foreign corporation a controlled foreign corporation?		Yes	XN	0	

		Transfer of Property	(see instru	ctions)		
Section A - Cas		(6)		(a)	(4)	(a)
Type of property	(a) Date of transfer	(b) Description of property		(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022			158,900.		
lf "Yes," sk		sferred? art III and go to Part IV. r than intangible prop	erty subje	ct to section 36		X Yes No
Type of property	(a) Date of transfer	(b) Description of property	Fair m	(c) arket value on e of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities						
Inventory						
Other property (not listed under another category)						
Property with built-in loss						
 Totals						
foreign cor If "Yes," go b Was the trace (including a If "Yes," co c Immediate transferee If "Yes," co d Enter the t	poration? to to line 12b. ansferor a domestic a branch that is a fore ontinue to line 12c. If ly after the transfer foreign corporation? ontinue to line 12d. If ransferred loss amounsferor transfer prop	anch (including a branc corporation that transfe eign disregarded entity) to "No," skip lines 12c and was the domestic co "No," skip line 12d, and ant included in gross ince erty described in section stions 14a through 15.	rred substarto a specifie 12d, and gorporation a go to line 13 ome as required.	oreign disregarded intially all of the assignment of the assignmen	sets of a foreign breign corporation? er with respect to	Yes No
Section C - Inta	ngible Property S	ubject to Section 367	(d)			
Type of property	(a) Date of transfer	(b) Description of property	(c) Useful life	(d) Arm's length price on date of transfer	(e) Cost or other basis	(f) Income inclusion for year of transfer (see instructions)
Property described in sec. 367(d)(4)						
Totals						

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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?	Yes Yes Yes	No No No
Part	IV Additional Information Regarding Transfer of Property (see instructions)		
16 17 18 a b c d 19 20a	Enter the transferor's interest in the transferee foreign corporation before and after the transfer. (a) Before	Yes Yes Yes Yes Yes Yes Yes Yes	X No X No
c 21	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 Yes	X No

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

15,408.

04/28/2022 EUROS

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

(A) DATE OF (B)	DESCRIPTION (COOF PROPERTY	C) FMV ON DATE (D)	COST OR (F)	GAIN RECOGNIZED
TRANSFER		OF TRANSFER	OTHER BASIS	ON TRANSFER
04/29/2022	 EUROS	698.	698.	

15,408.

STATEMENT 1

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

12/23/2022 EUROS 2,727. 2,727.

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

04/26/2022 EUROS 2,802. 2,802.

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY _____

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

08/03/2022 EUROS 1,568. 1,568.

FORM 926 -	PART III - TRANSFERS -	OTHER PROPERTY

(A) DATE OF (B) TRANSFER	DESCRIPTION ((OF PROPERTY	C) FMV ON DATE (D) OF TRANSFER	COST OR (F) OTHER BASIS	GAIN RECOGNIZED ON TRANSFER
07/01/2022	EUROS	81.	81.	
03/16/2022	EUROS	282.	282.	
03/28/2022	EUROS	509.	509.	
12/22/2022	EUROS	240.	240.	

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY _____

(A) DATE OF	(B) DESCRIPTION	(C) FMV ON DATE (D)	COST OR (F) GAIN RECOGNIZED
TRANSFER	OF PROPERTY	OF TRANSFER	OTHER BASIS	ON TRANSFER
05/03/2022	FIIROS	14	14	

05/03/2022 EUROS 05/17/2022 EUROS 22,337. 22,337. _______

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY _____

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

01/18/2022 EUROS 30,370. 30,370. 11/14/2022 EUROS

15,930.

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY _____

(A) DATE OF (B)	DESCRIPTION (C) OF PROPERTY	FMV ON DATE (D)	COST OR (F)	GAIN RECOGNIZED
TRANSFER		OF TRANSFER	OTHER BASIS	ON TRANSFER
03/16/2022	 EUROS	141.	141.	

15,930.

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY _____

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

05/20/2022 EUROS 2,882. 2,882. ______

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY _____

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER ______

10/14/2022 EUROS 1. 1. FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

11/14/2022 EUROS 28,641. 28,641.

FORM 926 - PART III - TRANSFERS - STOCK AND SECURITIES

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER

09/27/2021 SECURITIES 87. 87.

FORM 926 - PART III - TRANSFERS - STOCK AND SECURITIES ______

(A) DATE OF (B) DESCRIPTION (C) FMV ON DATE (D) COST OR (F) GAIN RECOGNIZED TRANSFER OF PROPERTY OF TRANSFER OTHER BASIS ON TRANSFER _____ -----

12/31/2021 SECURITIES 6. 6. ______

FORM 926 - PART III - TRANSFERS - CASH

(A) DATE OF TRANSFER	(C) FMV ON DATE OF TRANSFER
06/10/2022	7.
07/07/2022	14.
11/18/2022	16.
12/19/2022	9.

Form **8865**

Department of the Treasury Internal Revenue Service

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

Information furnished for the foreign partnership's tax year

beginning 01/01/2022 , and ending 12/31/2022 OMB No. 1545-1668

Attachment Sequence No. 865

Name of person filing this return							Filer's identification number					
ROBE	ERT W. WOODRUFF ARTS	CENTI	ER, INC.			58-0633971						
Filer's a	address (if you aren't filing this form	with your ta	x return)	A Catego	ory of filer (see Cat	egories	of Filers	in the instru	ctions and check	applicable box(e	s)):
				1		2		3	X	4		
				B Filer's	tax year be	ginning	0	6/01	/2022	, and ending	05/31/	2023
C F	iler's share of liabilities: Nonreco	urse \$		Qualified	nonrecou	ırse fin	ancing	\$		Other \$		
D If	filer is a member of a consolida	ated grou	p but not the	parent, en	ter the fo	llowing	inform	ation al	bout the par	ent:		
	lame					EII	N					
	ddress											
	check if any excepted specified f				ed on this	form. S	See inst	truction	s			
F Ir	nformation about certain other p	artners (s	ee instructions	s)			1			T		
	(1) Name		(2	2) Address			(3) ld	lentifica	tion number		eck applicable bo	constructive
				<u></u>			\ <i>'</i>			Category 1	Category 2	owner
C4 N	lame and address of foreign part	n arabin								2(a) FIN (if a		
GTIN	rame and address or foreign part	nersnip								2(a) EIN (if a	• /	
										98-1350	e ID number (se	o instructions)
DTCI	ד ע כועונט עווכרוע דערט	D								Z(b) Reference	e ib ilullibei (se	e ilisti uctions)
	TAL ALPHA FUND A, L		. Omia 11							3 Country un	der whose law	e organized
3535 EXECUTIVE TERMINAL DRIVE STE 110 HENDERSON, NV 89052										CJ	aci wiloscian	o organizou
	Pate of 5 Principal pla	ce of	6 Principal	business	7	Princip	al busir	ness	8a Funct	tional currency	8b Exchang	ne rate
	rganization business			ode numbe			STINC			USD		tructions)
06	5/05/2017 CJ		523	900	-		J 1 1140		,	355	1.00	0000000000
	rovide the following information	for the f			ear:							
	lame, address, and identification	number	of agent (if an	y) in the	2 (_	partnership	_		
	Times States						orm 10			_	X Form 106	5
								wnere	Form 1065 is	Tilea:		
3 1	lame and address of foreign par	tnerchin's	agent in cour	ntry of	EFILE 4 Name and address of person(s) with custody of the books and records of the							
0	rganization, if any STMT 1	ti i Ci Si ii p s	agent in cour	iti y Oi						n of such books a		
	5 SIMI I											
март	LES CORPORATE SERVIC	ES LI	MITTED									
5	During the tax year, did the			av or accri	ıe anv in	toroct	or rov	alty fo	r which th	e deduction is	not	
J	allowed under section 267A?			ay or accre	ac ally il	ileresi	01 10y	alty 10		e deduction is	Yes	X No
	If "Yes," enter the total amour			uctions							\$	
6	Is the partnership a section 72										Yes	X No
7	Were any special allocations r	nade by t	he foreign part	nership?							Yes Yes	X No
8	Enter the number of Forms	8858, In	formation Re									
	(FDEs) and Foreign Branches (F											
9	How is this partnership classif	fied unde	r the law of th	ne country i	n which it	's orga	nized?		EXEM	PTED LIMIT	TED PARTN	ERSHIP
10 a	Does the filer have an interest											
	separate unit under Regulation 1.1503(d)-1(b)(4)(ii)? If "No," sl											X No
b	If "Yes," does the separate un section 1.1503(d)-1(b)(5)(ii)?										Yes	No
11 Does this partnership meet both of the following requirements?									`			
	1. The partnership's total rece				n \$250,00	0.						
	2. The value of the partnershi If "Yes," don't complete Sched	•		end of the ta	ax year wa	as less	than \$	1 millio	n. 💍		Yes Yes	X No

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

Form 8865 (2022) Page **2**

OIIII OO	100 (2	022)										r age 🚣
12 a			of this Form 8865 clain on transaction with the fo	•	,	,	,	,		,		☐ No
b			amount of gross receipts its computation of foreigr		•			• .	•			
С			amount of gross receipts its computation of FDDEI								filer	
			amount of gross receipts of ation of FDDEI						the filer i	nclude	d in	
13	Ente	r the r	number of foreign partners rship or of receiving a distr	subject to s	ection 864(c)(8) as	s a result of trans	sferring	all or a port				
14	At a	ny tim	ne during the tax year we nts of Regulations section ?	re any trans	fers between the	partnership and	its part	ners subje	ct to the	disclos	sure	X No
ign Here You're F his Form eparatel	iling o y and	and	er penalties of perjury, I decla pelief, it is true, correct, and o mation of which preparer has	complete. Dec	laration of preparer (d	• .					•	owledge
ax Retur		Sign	ature of general partner or lim	ited liability cor	mpany member			Date				
Paid Preparer		Print/	Гуре preparer's name		Preparer's signatu	Date		Check self-emp	if PTIN			
Jse O		Firm's	name						F	Firm's El	N	
550 0	,y	Firm's	address Constructive Own							Phone no		
			box b , enter the na interest you constr	uctively ov	wn. See instruc	ctions.	Owns a	constructiv	ve interest	t .	Check if	Check if direct partner
											poroen	paration
Sche	dule	₽ A-1	Certain Partners o	f Foreign	Partnership (se	ee instructions	s)				'	
			Name		Add	ress		Identifi	cation nu	ımber (if any)	Check if foreign person
Sche	dule	e A-2	Foreign Partners	of Section	721(c) Partne	rship (see ins	tructio	ns)				
Name pa	of fo		Address		Country of organization (if any)	U.S. taxpay identification n (if any)		Check if r U.S. trai			Percentage ir apital	terest Profits
											% %	<u>%</u>
Does t	he p	artne	rship have any other for	eign persor	n as a direct partr	ner?					Yes	No
Sche	dule	e A-3	Affiliation Schedu direct interest or in	le. List all directly ov	l partnerships (wns a 10% inte	(foreign or do rest.	mestic) in whic	h the f	oreigi	n partnersh	ip owns a
			Name		Address	EIN T (if any)			otal ordinary ncome or loss	Check if foreign partnership		
SEE S	STA	TEME	NT 2									

Form 8865 (2022)

Salvo Ivid R. Income Statement - Trade or Rusiness Income

	nedule		
Cau		clude only trade or business income and expenses on lines 1a through 22 below. See the in	istructions for more information.
		Gross receipts or sales	
	b L	ess returns and allowances	1c
	2 C	Cost of goods sold	2
Income		Gross profit. Subtract line 2 from line 1c	
Ö	4 C	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4
<u>Ž</u>	5 N	let farm profit (loss) (attach Schedule F (Form 1040))	5
		let gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	
		Other income (loss) (attach statement)	7
		otal income (loss). Combine lines 3 through 7	8
_		calaries and wages (other than to partners) (less employment credits)	9
ons		Guaranteed payments to partners	10
itati		Repairs and maintenance	
instructions for limitations)		ad debts	
s fo			
tion		Rent	
truc		axes and licenses	
ins		nterest (see instructions)	15
ees)	16a D	Depreciation (if required, attach Form 4562)	40.
<u>s</u>		ess depreciation reported elsewhere on return	16c
<u>6</u>		Depletion (Don't deduct oil and gas depletion.)	17
달		Retirement plans, etc.	
Deductions		mployee benefit programs	
صّ		Other deductions (attach statement)	
		otal deductions. Add the amounts shown in the far right column for lines 9 through 20	
		Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	
Ħ		Reserved for future use	
ne		Reserved for future use	
Payment		Reserved for future use	
		Reserved for future use	
and		Reserved for future use	
×		Reserved for future use	
Тах		Reserved for future use	
0.0	30 R hedule	Reserved for future use	Total amount
SC			
	1	Ordinary business income (loss) (Schedule B, line 22)	
	2	Net rental real estate income (loss) (attach Form 8825)	2
	3 a	` '	-
	b	, , ,	2.5
	C	Guaranteed	3c
S	4	payments: a Services 4a b Capital 4b	4.5
So	_ c		4c
7	5	Interest income	5
Ĕ	6	Dividends and dividend equivalents: a Ordinary dividends	6a
Income (Loss)		b Qualified dividends 6b	
=	7	c Dividend equivalents . 6c Royalties	7
	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8
	9 a		9a
	b		34
	C		-
	10	Unrecaptured section 1250 gain (attach statement) 9c Net section 1231 gain (loss) (attach Form 4797)	10
	11	Other income (loss) (see instructions) (1) Type (2) Amount	11(2)
	12	Section 179 deduction (attach Form 4562)	12
Z	13 a		13a
	, u		
댨	h	Investment interest expense	13b
Deductions	b		13b 13c(2)

2X1913 1 000

roim c	865 (202	(2) DIGITAL ALPHA FUNL) A, LP		98-135043	4		Page 4
Sch	edule k	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
. 5.	. 14a		-	•		14a		
등음	b							
တ္ထမ္	C				14a 14b 14c 15a 15b 15c 15c			
14a 14a 14b 14b 14c								
	1	_						
<u>:</u>			: · · · · · · · · · · · · · · · · · · ·					
Schedule K P 14a Net ea b Gross c Gros		· ·						
ū								
	1	· ·	,				in the second se	
International		Attach Schedule K-2 (Form 8	865), Partners' Distributi	ve Share Items - Interna		131		
×	17a	Post-1986 depreciation adju	ıstment			17a		
Tay Tay	b	Adjusted gain or loss		17b				
풀도	С	Depletion (other than oil and	gas)			17c		
	d							
⋛⋛	е							
	f	Other AMT items (attach sta	17f					
_	18 a	Tax-exempt interest income				18a		
r Information	b	Other tax-exempt income .		18b				
	С	•						
	19 a							
뀰	b							
Ę	20 a					20a		
ţ	b		20b					
0								
<u> </u>		Total foreign taxes paid or a	ccrued		· · · · · · · · · · · · · · · · · · ·	21		
Sch	edule L	Balance Sheets per E			is answered "Y			
		Acceto			4.	Ena		
			(a)	(b)	(c)		(a)	
		ŭ						
		•						
		,						
	•	•						
		•						
		et of any amortization)						
		le assets (amortizable only)						
	_	cumulated amortization.						

Beginning of tax year End of tax year (a) (b) (c) 13 Other assets (attach statement)	ued)
3 Other assets (attach statement)	
4 Total assets	(d)
Liabilities and Capital Accounts payable	
Accounts payable	
Mortgages, notes, bonds payable in less than 1 year Other current liabilities (attach statement) All nonrecourse loans	
Other current liabilities (attach statement) All nonrecourse loans . a Loans from partners (or persons related to partners) b Mortgages, notes, bonds payable in 1 year or more Other liabilities (attach statement) . Partners' capital accounts . Total liabilities and capital . Chedule M Balance Sheets for Interest Allocation (a) Beginning of tax year Total U.S. assets . Total foreign assets: a Passive category . b General category . c Other (attach statement) . Partners' capital accounts . Total liabilities and capital . Total U.S. assets . Total foreign assets: a Passive category . b General category . c Other (attach statement) . Partners' capital accounts . Total U.S. assets . Total foreign assets: a Passive category . b General category . c Other (attach statement) . Partners' capital accounts . Total U.S. assets for Interest Allocation (a) Beginning of tax year relative and tax year not included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Toeductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year relative and the partners of the	
All nonrecourse loans	
a Loans from partners (or persons related to partners) b Mortgages, notes, bonds payable in 1 year or more Other liabilities (attach statement) . Partners' capital accounts Total liabilities and capital Total liabilities and capital	
b Mortgages, notes, bonds payable in 1 year or more Other liabilities (attach statement) . Partners' capital accounts Total liabilities and capital Chedule M Balance Sheets for Interest Allocation (a) Beginning of tax year Total U.S. assets	
Other liabilities (attach statement) . Partners' capital accounts	
Partners' capital accounts Total liabilities and capital (a) Beginning of tax year Total U.S. assets. Total foreign assets: a Passive category	
Total U.S. assets. Total foreign assets: a Passive category. b General category. c Other (attach statement). Net income (loss) per books. Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): Guaranteed payments (other than health insurance). Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize): a Depreciation \$ b Travel and entertainment \$ b Travel and entertainment \$ c Albines A Income (loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") 6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize): a Depreciation \$ b Travel and entertainment \$ b Travel and entertainment \$ c A Beginning of tax year (leax year) Beginning of tax year (leax year) Beginning of tax year (leax year) A Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") 6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize): a Depreciation \$ b Travel and entertainment \$ b Income (loss). Subtract line 8	
Total U.S. assets. Total foreign assets: a Passive category b General category c Other (attach statement) Net income (loss) per books . Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Guaranteed payments (other than health insurance)	
Total U.S. assets. Total foreign assets: a Passive category b General category c Other (attach statement) Chedule M-1 Reconcilitation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books . Income included on Schedule K, Iines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$	
Total U.S. assets. Total foreign assets: a Passive category	
Total U.S. assets. Total foreign assets: a Passive category b General category c Other (attach statement) chedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") 6 Income recorded on books this tax year not included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Guaranteed payments (other than health insurance) Expenses recorded on books this tax year intincluded on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$ b Travel and entertainment \$ 1	(b)
Total U.S. assets. Total foreign assets: a Passive category b General category. c Other (attach statement). Chedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books . Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Tax-exempt interest \$	End of tax year
Total foreign assets: a Passive category b General category c Other (attach statement) Chedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books . Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Guaranteed payments (other than health insurance) Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$	
a Passive category b General category c Other (attach statement) Chedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books . Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): S	
b General category c Other (attach statement) chedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books . Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Guaranteed payments (other than health insurance) Expenses recorded on books this tax year (itemize): Expenses recorded on books this tax year (itemize): a Depreciation \$ b Travel and entertainment \$ B Add lines 6 and 7	
C Other (attach statement) Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): Guaranteed payments (other than health insurance) Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$	
Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not H11, page 1, is answered "Yes.") Net income (loss) per books	
H11, page 1, is answered "Yes.") 6 Income recorded on books this tax year not included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$	
Net income (loss) per books Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$	required if
Net income (loss) per books	
Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$ Guaranteed payments (other than health insurance)	
lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize): \$	
and 11, not recorded on books this tax year (itemize): \$	
this tax year (itemize): \$	
\$ Guaranteed payments (other than health insurance) Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize): a Depreciation \$ b Travel and entertainment \$	
Guaranteed payments (other than health insurance)	
than health insurance)	
Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize): a Depreciation \$	
this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize): a Depreciation \$	
Schedule K, lines 1 through 13d, and 21 (itemize): a Depreciation \$ b Travel and entertainment \$ 9 Income (loss). Subtract line 8	
13d, and 21 (itemize): a Depreciation \$ b Travel and entertainment \$ 9 Income (loss). Subtract line 8	
a Depreciation \$ b Travel and entertainment \$ 9 Income (loss). Subtract line 8	
b Travel and entertainment \$ 8 Add lines 6 and 7	
9 Income (loss). Subtract line 8	
A del line e A Alemania A	
chedule M-2 Analysis of Partners' Capital Accounts. (Not required if Item H11, page 1, is answered "	Yes.")
Balance at beginning of tax year 6 Distributions: a Cash	
Capital contributed: b Property	
a Cash · · · · · Dother decreases (itemize): \$	
b Property	
Net income (loss) per books	
Other increases (itemize): \$	
8 Add lines 6 and 7	
9 Balance at end of tax year.	

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).

	ibabilon that boodined botween ti	to toroigh partitoromp and the	ne percene netea ni cela	innie (a) tilleagii (a).	
	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				
	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				
Ť	/tad mice i tineagn e				
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance				
	during the tax year). See				
	instructions				
					0005

SCHEDULE 0 (Form 8865)

(Rev. October 2021)

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

Department of the Treasury Internal Revenue Service				See the instructions for instructions					
Name of transferor	•					Filer's identi	ifying number		
DIGITAL ALPHA	A FUND A,	LP				58-063	3971		
Name of foreign partner	ship			EIN (if any)		Reference II	D number (see inst	ructions)	
DIGITAL ALPHA	A FUND A,	LP		98-1350432					
See instructi b If "Yes," was Was any into any time the	ons	al method applie ty transferred o orm contribution	d to avoid the r considered or a on as defined ir	ined in Regulations ecognition of gain up anticipated to be, a Regulations section	oon the contri t the time of	bution of p	property?	Yes [X No No
Part I Transf	ers Reportabl	e Under Section	on 6038B						
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market v on date of tra		er Recov	(e) /ery period	(f) Section 704(c) allocation method	(g) Gain reco on tran	gnized
Cash	12/31/2022		128,	898.					
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			128,	898					
3 Enter the tra Supplemental Info Part II Dispos (a) Type of	rmation Requ		t in the partners	ship: (a) Before the tra	(f) Deprecia recaptu recogniz	tion re ted	(g) Gain allocated to partner	(h) Depreci recapture a	iation allocated
26:14 - 11	•		•	to gain recognitio		tion 904(1	· · ·	to part	X No

FORM 8865, PAGE 1 DETAIL

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

NAME LINE 1: MAPLES CORPORATE SERVICES LIMITED

ADDRESS LINE 1: PO BOX 309, UGLAND HOUSE

CITY: GRAND CAYMAN STATE: CAYMAN ISLANDS

COUNTRY: CJ

POSTAL CODE: HY1-1104 FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE

NAME LINE 1: DA CLOUD HOLDINGS, LLC

ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110

HENDERSON

STATE: NV ZIP: 89052

98-1414746 TD:

FOREIGN PARTNERSHIP:

CITIES DIGITAL INFRASTRUCTURE, LLC 3535 EXECUTIVE TERMIAL DR, STE 110 NAME LINE 1: ADDRESS LINE 1:

CITY: HENDERSON

STATE: NV 89052 ZIP:

ID: 84-3722404

NAME LINE 1: CONNECTED FUTURE, LLC

ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110

CITY: HENDERSON

STATE: NV 89052 ZIP:

ID: 84-1789181

DA SAFETY SOLUTIONS I, LP

NAME LINE 1: ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110

CITY: HENDERSON

STATE: NV ZIP: 89052

98-1589850

FOREIGN PARTNERSHIP: X

NAME LINE 1: DIGITAL ALPHA SOLUTIONS FUND, LP 3535 EXECUTIVE TERMIAL DR, STE 110 ADDRESS LINE 1:

HENDERSON CITY:

STATE: NVZIP: 89052

98-1681558

FOREIGN PARTNERSHIP:

Form **8865**

Department of the Treasury Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return.

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

, and ending 12/31/2022 OMB No. 1545-1668

Attachment Sequence No. 865

Internal	Revenue Service	beg	inning	01/0	1/2022	, and endi	ing	12/3	1/2022		Sequence N	lo. 865
Name o	f person filing this	return					File	r's identifica	ation numbe	er		
ROBE	RT W. WOO	DRUFF ARTS C	ENTE	R, INC.			58	-0633973	1			
Filer's a	ddress (if you are	en't filing this form with	your tax	return)	A Category	of filer (see C	Categ	gories of Filers	in the instru	ctions and check	applicable box(e	s)):
					1	2		3	X	4		
					B Filer's tax	,		01/01	/2022	, and ending	12/31/2	2022
C Fi	ler's share of lia	abilities: Nonrecourse	e \$		Qualified no	nrecourse	finar	ncing \$		Other \$		
D If	filer is a memb	er of a consolidated	d group	but not the	parent, enter			nformation al	bout the par	ent:		
	ame						EIN					
	ddress											
		epted specified fore				on this form	ı. Se	e instruction	s			
F In	formation abou	t certain other partr	ners (se	e instructions	S)					100		
	(1) Na	ime		(2	2) Address			(3) Identifica	tion number		ck applicable bo	Constructive
										Category 1	Category 2	owner
G1 N:	ame and addre	ss of foreign partner	shin							2(a) EIN (if ar	nv)	
O 1 111	arro arra adaro.	oo or roroigir pararor	omp.							98-1473	• /	
T.AKF	STAR III,	T.D								2(b) Reference		e instructions)
	•	AFALGAR COUR	т								,	,
	· · ·	ST PETER POR								3 Country und	der whose law	s organized
	GY1 3PP									GK		•
	ate of	5 Principal place	of	6 Principal				l business	8a Funct	ional currency	8b Exchang	
or	ganization	business		activity co	ode number	activ INVE	ity STI	MENTS	l E	EUR	(see inst	tructions)
08	/03/2017	GK		523	900						0.95	0940000000
H Pr	rovide the follow	wing information for	the fo	reign partner	ship's tax yea	r:			•			
		and identification nu	umber (of agent (if an	y) in the	2 Chec	ck if	the foreign	partnership	must file:	_	
Uı	nited States						Fo	rm 1042	For	m 8804	X Form 106	5
						Servi	ice C	Center where I	Form 1065 is	filed:		
						EF	'IL	E				
		ss of foreign partne	rship's	agent in cour	ntry of	Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different STMT 1						
Oi	ganization, if ar	ny STMT 1				STM	ÏΤ̈́.	1	u 100u			
LAKE		(G.P.) LIMIT								ES (GUERNS		TED
5		x year, did the for										
	allowed under	section 267A? See	Instruc	ctions			• •				Yes	X No
•		the total amount o										No.
6 7		cial allocations mad										<u> </u>
		mber of Forms 885										
8		reign Branches (FBs										
9		artnership classified										
		have an interest in			•							
10 a		under Regulations										
		(4)(ii)? If "No," skip										X No
b		the separate unit o										
		3(d)-1(b)(5)(ii)?		•						•	Yes	No
11		tnership meet both o							`			
	1. The partner	rship's total receipts	s for th	e tax year we	ere less than \$	3250,000.			(
	2. The value of	of the partnership's	total a	ssets at the	end of the tax	year was le	ss th	han \$1 millio	n. 🖊		Yes	X No
		complete Schedule							<u> </u>			
For Pri	ivacy Act and F	Paperwork Reducti	on Act	Notice, see t	the separate i	nstructions	S .				Form 8	3865 (2022)

LAKESTAR III, LP 98-1473139 Form 8865 (2022) Page 2 Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with 12 a respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions Yes Nο Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI)........... Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI 13 Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership 14 At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? X No 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 all if You're Filing information of which preparer has any knowledge. This Form Separately and **Not With Your** Date Signature of general partner or limited liability company member Tax Return. Date Check Print/Type preparer's name Preparer's signature if **Paid** self-employed **Preparer** Firm's name Firm's EIN Use Only Firm's address Phone no. Constructive Ownership of Partnership Interest. Check the boxes that apply to the filer. If you check Schedule A box b, enter the name, address, and U.S. taxpayer identification number (if any) of the person(s) whose interest you constructively own. See instructions. X Owns a direct interest Owns a constructive interest Check if Check if Name Address Identification number (if any) foreign direct partner Certain Partners of Foreign Partnership (see instructions) Check if Name Address Identification number (if any) foreign person Foreign Partners of Section 721(c) Partnership (see instructions) Schedule A-2 Country of organization (if any) U.S. taxpayer Percentage interest Name of foreign Check if related to U.S. transferor identification number Address partne Capital **Profits** (if anv) % % % % Does the partnership have any other foreign person as a direct partner? Yes No Affiliation Schedule. List all partnerships (foreign or domestic) in which the foreign partnership owns a Schedule A-3

Form **8865** (2022)

Total ordinary

income or loss

EIN

(if any)

Check if

foreign

partnership

Name

Address

direct interest or indirectly owns a 10% interest.

Page 3

LAKESTAR III, LP 98-1473139 Form 8865 (2022)

Schedule B Income Statement - Trade or Business Income				
Cau	tion: Inc	clude only trade or business income and expenses on lines 1a through 22 below. See the in	struct	ions for more information.
Income	1a G	ross receipts or sales		
		ess returns and allowances	1c	
			2	
	2 0	ost of goods sold	3	
		ross profit. Subtract line 2 from line 1c		
		rdinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
	5 N	et farm profit (loss) (attach Schedule F (Form 1040)).	5	
		et gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
		ther income (loss) (attach statement)	7	
		otal income (loss). Combine lines 3 through 7	8	
Deductions (see instructions for limitations)	9 S	alaries and wages (other than to partners) (less employment credits)	9	
	10 G	uaranteed payments to partners	10	
		epairs and maintenance	11	
		ad debts	12	
		ent	13	
		axes and licenses	14	
		sterest (see instructions)	15	
		epreciation (if required, attach Form 4562) <u>16a</u>		
		ess depreciation reported elsewhere on return	16c	
			17	
		epletion (Don't deduct oil and gas depletion.)	18	
		etirement plans, etc.		
		mployee benefit programs	19	
		Other deductions (attach statement)	20	
		otal deductions. Add the amounts shown in the far right column for lines 9 through 20	21	
\rightarrow		rdinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
Ħ		eserved for future use	23	
Tax and Payment		eserved for future use	24	
	25 R	eserved for future use	25	
	26 R	eserved for future use	26	
	27 R	eserved for future use	27	
	28 R	eserved for future use	28	
		eserved for future use	29	
		eserved for future use	30	
Sc	Schedule K Partners' Distributive Share Items			Total amount
	1 Ordinary business income (loss) (Schedule B, line 22)			
	2	Net rental real estate income (loss) (attach Form 8825)	2	
	3 a			
	b			
	C		3с	
	4	Guaranteed payments: a Services 4a b Capital 4b	33	
(SS			4c	
SO.	5	Interest income	5	
7	6	Dividends and dividend equivalents: a Ordinary dividends	6a	
Ĕ	"	b Qualified dividends 6b	Va	
0		b Qualified dividends bb		
ತ		Divide the second secon		
Income (Loss)	_	c Dividend equivalents . 6c	_	
<u>n</u>	7	c Dividend equivalents . 6c	7	
luce	8	c Dividend equivalents . 6c Royalties	8	
luce	8 9 a	c Dividend equivalents . 6c Royalties		
luce	8 9 a b	c Dividend equivalents . 6c Royalties	8	
Inc	8 9 a b c	c Dividend equivalents . 6c Royalties	8 9a	
lnce	8 9 a b	c Dividend equivalents . 6c Royalties	8	
luce	8 9 a b c	c Dividend equivalents . 6c Royalties	8 9a	
	8 9 a b c	c Dividend equivalents . 6c Royalties	8 9a 10	
	8 9 a b c 10	c Dividend equivalents . 6c Royalties	8 9a 10 11(2)	
	8 9 a b c 10 11	c Dividend equivalents . 6c Royalties	9a 10 11(2) 12	
Deductions Inc	8 9 a b c 10 11 12 13 a	c Dividend equivalents . 6c Royalties	9a 10 11(2) 12 13a	

2X1913 1.000

Form a	3865 (202	2) LAKESTAR III, LP			98-14/313	9		Page 4
Sch	edule k	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
- Ş	_ 14a	Net earnings (loss) from self	-employment			14a		
Self- Employ-	b	Gross farming or fishing inco	ome			14b		
о Б	E c	Gross nonfarm income				14c		
	15 a	Low-income housing credit (15a		
w	b	Low-income housing credit ((other)			15b		
di:	С	Qualified rehabilitation expe	nditures (rental real es	tate) (attach Form 3468)		15c		
Credits	d	Other rental real estate cred	lits (see instructions)	Type		15d		
O	е	Other rental credits (see ins	tructions)	Туре		15e		
	f	Other credits (see instruction	ns)	Туре		15f		
International	16	Attach Schedule K-2 (Form 8) check this box to indicate that y						
	17a	Post-1986 depreciation adju	ıstment			17a		
Alternative Minimum Tax	b	Adjusted gain or loss				17b		
필달	С	Depletion (other than oil and				17c		
Jag E	d	Oil, gas, and geothermal pro	perties - gross income.			17d		
₹≣₹	е	Oil, gas, and geothermal pro	operties - deductions			17e		
	f	Other AMT items (attach sta	tement)			17f		
	18a	Tax-exempt interest income				18a		
Other Information	b	Other tax-exempt income .		18b				
	С	Nondeductible expenses	18c					
Ľ	19 a	Distributions of cash and ma	19a					
nfo	b	Distributions of other proper				19b		
Ī	20 a	Investment income				20a		
ţ	b	Investment expenses.				20b		
0	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	· · · · · · · · · · · · · · · · · · ·	l if Item H11, page 1, is	answered "Y			
		A 4 -		g of tax year		End	l of tax year	
		Assets	(a)	(b)	(c)		(d)	
1								
		otes and accounts receivable.						
		owance for bad debts						
_		ies						
4		vernment obligations						
5 6		npt securities Irrent assets (attach statement)						
-		p partners (or persons related to						
, a)						
b		e and real estate loans						
8		vestments (attach statement)						
_		s and other depreciable assets						
	U	cumulated depreciation.						
		ole assets						
		cumulated depletion						
		et of any amortization)						
12 a	Intangibl	le assets (amortizable only)						
b	l ess acc	cumulated amortization				_		

LAKESTAR III, LP 98-1473139 Form 8865 (2022)

Scl	nedule L Balance Sheets per Boo			, page 1, is ans		
		Beginni	ng of tax year		End	d of tax year
		(a)	(b)	(c)	(d)
3	Other assets (attach statement)					
ļ	Total assets					
	Liabilities and Capital					
	Accounts payable					
	Mortgages, notes, bonds payable in less than 1 year					
	Other current liabilities (attach statement)					
	All nonrecourse loans					
а	Loans from partners (or persons related to partners)					
b	Mortgages, notes, bonds payable in 1 year or more					
)	Other liabilities (attach statement)					
	Partners' capital accounts					
2	Total liabilities and capital					
C	nedule M Balance Sheets for Int	erest Allocation				
				(a)		(b)
				Beginni	- 1	End of
				tax ye	ear	tax year
	Total U.S. assets					
	Total foreign assets:					
а	Passive category					
b	General category					
С	Other (attach statement)					
cl	nedule M-1 Reconciliation of Inco	me (Loss) per	Books Witl	n Income (Los	s) per Returr	n. (Not required if I
	H11, page 1, is answer	ed "Yes.")				,
!	Net income (loss) per books Income included on Schedule K,		yea	ome recorded on t r not included on s 1 through 11 (iter	Schedule K,	
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize):		a Tax	x-exempt interest	\$	
	\$		7 Dec	luctions included	on Schedule	
	Guaranteed payments (other			ines 1 through 13d		
	than health insurance)			rged against book		
	Expenses recorded on books			year (itemize):	income ins	
	this tax year not included on			oreciation \$		
	Schedule K, lines 1 through		a be	preciation ψ		
	13d, and 21 (itemize):		_			
9	Depreciation \$					
	Travel and entertainment \$		8 Add	d lines 6 and 7		
IJ	Haver and entertainment φ			d lines 6 and 7. ome (loss). Sub		
	Add lines 1 through 4			m line 5		
	nedule M-2 Analysis of Partners' 0	Capital Accounts				wered "Yes ")
<u>ت</u>		p.i.a. / 1000a/110				
	Balance at beginning of tax year		6 Dis	tributions: a Casl		
	Capital contributed:				perty	
	a Cash		7 Oth	ner decreases (ite	mize): \$	
	b Property					
	Net income (loss) per books					
	Other increases (itemize): \$		_			
			8 Ad	d lines 6 and 7	∟	
5	Add lines 1 through 4			ance at end on the contract line 8 from		

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).

	ibabilon that boodined botween ti	to toroigh partitoromp and the	ne percene netea ni cela	innie (a) tilleagii (a).	
	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				
	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				
Ť	/tad mice i tineagn e				
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance				
	during the tax year). See				
	instructions				
					0005

SCHEDULE O (Form 8865)

(Rev. October 2021)

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

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

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service				for instructions an					
Name of transferor						Filer's ident	tifying number		
LAKESTAR III,	LP					58-063	33971		
Name of foreign partnersl	nip			EIN (if any)		Reference I	ID number (see ins	tructions)	
LAKESTAR III,	LP			98-1473139					
2 Was any inta	ns ne gain deferr ngible proper	al method applie	d to avoid the r	ined in Regulation ecognition of gain uniticipated to be, a Regulations secti	ipon the cont at the time c	ribution of f the trans	property?	Yes Yes	X No No
		le Under Section		r Regulations secti	011 1.402-7(0	·)(¹) !		Yes	X No
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market v on date of tra		her Rec	(e) overy period	(f) Section 704(c) allocation method	Gain re	(g) ecognized transfer
Cash									
Stock, notes receivable and payable, and other securities									
Inventory									
Tangible property used in trade or business									
Intangible property described in section 197(f)(9)									
Intangible property, other than intangible property described in section 197(f)(9)									
Other	09/15/2022	FOREIGN CURREN	C 168,	628. 168	3,330.				
property									
Totals			168,	628 160	3,330.			-	
			t in the partners	ship: (a) Before the tr		.515 %	(b) After the trans	sfer	0.515%
Part II Disposi	tions Report	able Under Se	ction 6038B						
(a) Type of property o	(b) Date of riginal transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f Depred recap recogn by partr	iation ture nized	(g) Gain allocated to partner	Depr recaptu	(h) reciation re allocated partner
	•		-	to gain recognition			```	Yes	X No

FORM 8865, PAGE 1 DETAIL

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

NAME LINE 1: LAKESTAR III (G.P.) LIMITED ADDRESS LINE 1: EAST WING, TRAFALGAR COURT

CITY: LES BANQUES STATE: ST PETER PORT

COUNTRY: GK

POSTAL CODE: GY1 3PP

ITEM H4 - CUSTODIAN OF BOOKS AND RECORDS

NAME LINE 1: AZTEC FINANCIAL SERVICES (GUERNSEY) LIMITED

ADDRESS LINE 1: EAST WING, TRAFALGAR COURT

LES BANQUES CITY: STATE: ST PETER PORT

COUNTRY: GΚ

BY1 3PP POSTAL CODE:

Form **8865**

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

2022

OMB No. 1545-1668

Attachment

Department of the Treasury Internal Revenue Service

beginning , and ending Sequence No. 865 Internal Revenue Service 01/01/2022 12/31/2022 Filer's identification number Name of person filing this return ROBERT W. WOODRUFF ARTS CENTER, INC 58-0633971 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)): Х 01/01/2022 and ending 12/31/2022 B Filer's tax year beginning Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Constructive Category 1 Category 2 G1 Name and address of foreign partnership 2(a) EIN (if any) 98-1613299 2(b) Reference ID number (see instructions) LEFT LANE CAPITAL PARTNERS II, LP 3 Country under whose laws organized 10 GRAND STREET, 21ST FLOOR BROOKLYN, NY 11569 CJ 5 Principal place of 7 Principal business 4 Date of 8a Functional currency 6 Principal business 8b Exchange rate organization business activity code number (see instructions) activity TNVESTMENT USD 523900 1.000000000000 07/09/2021 US Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the 2 Check if the foreign partnership must file: LEFT LANE CAPITAL PARTNERS II, LP Form 1042 Form 8804 X Form 1065 10 GRAND STREET, 21ST FLOOR Service Center where Form 1065 is filed: BROOKLYN, NY 11569 98-1613299 RETLE 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 foreign partnership, and the location of such books and records, if different organization, if any STMT 1 LEFT LANE CAPITAL PARTNERS II, LP LEFT LANE CAPITAL PARTNERS II, LP During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions X No Yes If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Х No Yes Were any special allocations made by the foreign partnership? Χ 7 Nο Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions 9 How is this partnership classified under the law of the country in which it's organized? EXEMPTED LIMITED PARTNERSHIP 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b X No If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. X 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. Form **8865** (2022) For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

01111 000	00 (20	722)											i age =
			of this Form 8865 clain any transaction with the fo		•	,	•	,		,		⁄es	No
			amount of gross receipts its computation of foreigr		•			• .	•				
С	Ente	r the a	amount of gross receipts its computation of FDDEI	derived from	all sales of intan	gible property to	the fo	reign pa	rtnership th	at the fi			
d	Ente	the a	amount of gross receipts of ation of FDDEI	derived from a	all services provid	led to the foreig	n partne	rship th	at the filer in		in		
13	Ente	r the r	umber of foreign partners	subject to se	ction 864(c)(8) as	s a result of trans	sferring a	all or a p	ortion of an				
			ship or of receiving a distresse during the tax year we										
	requ	iremer	nts of Regulations section	1.707-8?							\	⁄es	X No
Sign Here of You're Find Form Separately	iling / and	and b	or penalties of perjury, I decla pelief, it is true, correct, and o mation of which preparer has	complete. Decla		• .							edge
Tax Return		Signa	ature of general partner or lim	ited liability com	pany member			Dat	e				
Paid Prepar	rer	Print/1	ype preparer's name		Preparer's signatu	ıre		Date		check elf-emplo	if PTIN	1	
Use O	nly	Firm's								irm's EIN			
		Firm's	Constructive Own							hone no.			
			box b , enter the na interest you constr	uctively ow	n. See instruc	tions.	Owns a	constru	ctive interest		Check i	if	Check if
			Name		Add	ress	Id	entincat	on number	(ii ariy)	foreign person		direct partner
Sched	dule	A-1	Certain Partners o	f Foreign P	Partnership (se	ee instructions	 s)						
			Name		Add	ress		Iden	tification nu	mber (if	any)		Check if foreign person
Sched	dule	A-2	Foreign Partners	of Section		- '		ns)					
Name pa	of for		Address		Country of organization (if any)	U.S. taxpay identification n (if any)	er umber		if related to transferor	P Ca _l	ercentag oital		rest Profits
											%		%
Does th	he n	artnei	ship have any other for	eign nerson	as a direct partr	 ner?				Γ	% Yes	Σ	% K No
Sche				le. List all	partnerships (foreign or do	mestic) in wl	nich the f	oreign			
			Name		Address			El (if a	N any)	To	tal ordina ome or lo	ee l	Check if foreign partnership
SEE S	STAT	CEME	NT 2									#	
											F	88°	65 (2022)

Sc	hedu	le B Income Statement - Trade or Business Income		
Cau	tion:	Include only trade or business income and expenses on lines 1a through 22 below. See the in	struct	tions for more information.
	1a	Gross receipts or sales1a		
		Less returns and allowances	1c	
	2	Cost of goods sold	2	
e	3	Gross profit. Subtract line 2 from line 1c		
οū	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
Income	_	Net farm profit (loss) (attach Schedule F (Form 1040))	5	
_	5	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
	6 7	Other income (loss) (attach statement)	7	
	8	Total income (loss). Combine lines 3 through 7	8	
	9	Salaries and wages (other than to partners) (less employment credits)	9	
ons)	10	Guaranteed payments to partners.	10	
itati	11	Repairs and maintenance	11	
Ē	12		12	
s fo	13	Bad debts	13	
instructions for limitations)	14	Rent Taxes and licenses	14	
struc	15	Interest (see instructions)	15	
i	-	Depreciation (if required, attach Form 4562)	-10	
ees)		Less depreciation reported elsewhere on return	16c	
us	17	Depletion (Don't deduct oil and gas depletion.)	17	
ţ	18	Retirement plans, etc.	18	
n	19	Employee benefit programs	19	
Deductions	20	Other deductions (attach statement)	20	
	21	Total deductions. Add the amounts shown in the far right column for lines 9 through 20		
_	22	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
_	23	Reserved for future use	23	
ayment	24	Reserved for future use	24	
Ĕ	25	Reserved for future use	25	
Рау	26	Reserved for future use	26	
	27	Reserved for future use	27	
and	28	Reserved for future use	28	
а×	29	Reserved for future use	29	
-	30	Reserved for future use		
Sc	hedu	le K Partners' Distributive Share Items		Total amount
		Ordinary business income (loss) (Schedule B, line 22)	1	
		Net rental real estate income (loss) (attach Form 8825)	2	
	;	3a Other gross rental income (loss)		
		b Expenses from other rental activities (attach statement). 3b		
		c Other net rental income (loss). Subtract line 3b from line 3a	3с	
_	4	Guaranteed payments: a Services 4a b Capital 4b		
SS		c Total. Add line 4a and line 4b	4c	
Income (Loss)		5 Interest income	5	
ě	(6 Dividends and dividend equivalents: a Ordinary dividends	6a	
Ö		b Qualified dividends 6b		
<u>2</u>		c Dividend equivalents . 6c		
	7	7 Royalties		
	1	Net short-term capital gain (loss) (attach Schedule D (Form 1065))		
	9	Pa Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a	
		b Collectibles (28%) gain (loss) 9b		
		c Unrecaptured section 1250 gain (attach statement) 9c		
	10		10	
	11		11(2)	
ns	12	, , , , , , , , , , , , , , , , , , , ,	12	
ij	13	Ba Contributions	13a	
Deductions		b Investment interest expense	13b	
Sec			13c(2)	
	-1	d Other deductions (see instructions) (1) Type (2) Amount	13d(2)	

OHILL	0000 (202	2) LEFT LANE CAPITAL	PARINERS II, LP		90-101329	9		raye 1
Sch	edule K	Partners' Distributiv	e Share Items (contin	nued)			Total amount	
- ×	_ 14a	Net earnings (loss) from self	-employment			14a		
	b	Gross farming or fishing inco				14b		
Self- Employ-	С	Gross nonfarm income				14c		
	15a	Low-income housing credit (15a		
40	b	Low-income housing credit (15b		
Credits	С	Qualified rehabilitation expe				15c		
ē	d	Other rental real estate cred		Type	•	15d		
Ö	e	Other rental credits (see ins	,	Type		15e		
	f	Other credits (see instruction	•	Type		15f		
International	16	Attach Schedule K-2 (Form 8) check this box to indicate that y	865), Partners' Distributiv	ve Share Items - Interna				
×	17a	Post-1986 depreciation adju	ıstment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
ᇐᆴ	С	Depletion (other than oil and	gas)			17c		
F E E	d	Oil, gas, and geothermal pro	perties - gross income.			17d		
	е	Oil, gas, and geothermal pro	operties - deductions			17e		
`	f	Other AMT items (attach sta	tement)			17f		
	18 a	Tax-exempt interest income				18a		
o	b	Other tax-exempt income .		18b				
ati	С	Nondeductible expenses		18c				
Ē	19 a	Distributions of cash and ma	arketable securities			19a		
Je Je	b	Distributions of other proper	ty			19b		
	20 a	Investment income				20a		
Other Information	b	Investment expenses.				20b		
Ö	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	Books. (Not required	if Item H11, page 1,	is answered "Y	'es.")		
			Beginning	g of tax year		End	of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash							
2 a	Trade no	otes and accounts receivable						
		owance for bad debts						
3	Inventori	es						
		vernment obligations						
		npt securities						
		rrent assets (attach statement)						
		partners (or persons related to						
b	Mortgag	e and real estate loans						
8	Other in	vestments (attach statement)						
9 a	Buildings	s and other depreciable assets						
b	Less acc	cumulated depreciation.						
10 a	Depletab	ole assets						
b	Less acc	cumulated depletion						
		et of any amortization)						
12 a	Intangibl	e assets (amortizable only) .						
b	Less acc	cumulated amortization.						

Form 8865 (2022) Page 5 Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.") (continued) Beginning of tax year End of tax year (c) (d) (a) 13 Other assets (attach statement) 14 **Liabilities and Capital** 15 16 Mortgages, notes, bonds payable in less than 1 year 17 Other current liabilities (attach statement) All nonrecourse loans 18 **19 a** 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 Total liabilities and capital 22 Schedule M **Balance Sheets for Interest Allocation** (a) (b) Beginning of End of tax year tax year Total U.S. assets Total foreign assets: c Other (attach statement) Schedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return. (Not required if Item H11, page 1, is answered "Yes.") Income recorded on books this tax Net income (loss) per books . . . 1 year not included on Schedule K, Income included on Schedule K, lines 1 through 11 (itemize): lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, a Tax-exempt interest \$ _ and 11, not recorded on books this tax year (itemize): Deductions included on Schedule Guaranteed payments (other K, lines 1 through 13d, and 21, not than health insurance) charged against book income this Expenses recorded on books tax year (itemize): this tax year not included on a Depreciation \$ _ Schedule K, lines 1 through 13d, and 21 (itemize): a Depreciation \$ __ **b** Travel and entertainment \$ Add lines 6 and 7. 8 Income (loss). Subtract line 8 Add lines 1 through 4.... from line 5 Schedule M-2 Analysis of Partners' Capital Accounts. (Not required if Item H11, page 1, is answered "Yes.") Balance at beginning of tax year 1 Distributions: a Cash Capital contributed: 2 **b** Property a Cash Other decreases (itemize): \$___ **b** Property 3 Net income (loss) per books . . 4 Other increases (itemize): \$___ 8 Add lines 6 and 7. Balance at end of tax year.

Form **8865** (2022)

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).

		<u> </u>	<u>'</u>	() 3 ()	
	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				
	Sales of property rights (patents,				
3	trademarks, etc.) 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				
	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance during the tax year). See				
	instructions				
					F 0065 (0000)

SCHEDULE O (Form 8865)

Department of the Treasury

(Rev. October 2021)

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	<u> </u>						Filer's ider	tifying number	
LEFT LANE CA	PITAL PART	NERS II, L	P				58-06		
Name of foreign partner	rship			EIN (if an	y)		Reference	ID number (see inst	tructions)
LEFT LANE CA					513299				
	ions	on 721(c) partr 							Yes X No
	-	rty transferred o		-	-				
		orm contribution							Yes X No
Part I Transf	ers Reportabl	le Under Section	n 6038B						
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market on date of tra	I	(d) Cost or other basis	Red	(e) overy period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		496	,266.					
Stock, notes									
eceivable and									
payable, and other securities									
nventory									
Γangible									
property									
used in trade									
or business									
ntangible									
property									
described in section 197(f)(9)									
ntangible property,									
other than intangible	•								
property described n section 197(f)(9)									
- ()(-)									
Other									
property									
 Γotals			496	,266.					
	ansferor's perc	centage interes			Before the trans	fer	%	(b) After the trans	fer %
Supplemental Info									
_									
Part II Dispos	sitions Report	able Under Sec	tion 6038B						T
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition		(e) n recognized partnership	Depred recap recogr by partr	ture nized	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
						L .		(5) (6)	
12/21/14	•	rted on this sch	•	•	•			```	
section	n 904(f)(5)(F)?	<u> </u>						▶ 🔼	Yes X No

FORM 8865, PAGE 1 DETAIL

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

LEFT LANE CAPITAL PARTNERS II, LP 10 GRAND STREET, 21ST FLOOR BROOKLYN NAME LINE 1:

ADDRESS LINE 1:

STATE: NY 11569 ZIP:

ITEM H4 - CUSTODIAN OF BOOKS AND RECORDS

NAME LINE 1: LEFT LANE CAPITAL PARTNERS II, LP ADDRESS LINE 1: 10 GRAND STREET, 21ST FLOOR

BROOKLYN

STATE: NY 11569 ZIP:

FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE

LEFT LANE CAPITAL PARTNERS II AGGREGATOR, LP NAME LINE 1:

ADDRESS LINE 1: 10 GRAND STREET, 21ST FLOOR

CITY: BROOKLYN

STATE: NY 11569 ZIP:

98-1632971 ID:

Form **8865**

Department of the Treasury

Internal Revenue Service

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

Attach to your tax return.

Go to www.irs.gov/Form8865 for instructions and the latest information. Information furnished for the foreign partnership's tax year beginning , and ending 01/01/2022

12/31/2022

OMB No. 1545-1668

Attachment Sequence No. 865

Filer's identification number Name of person filing this return ROBERT W. WOODRUFF ARTS CENTER, INC 58-0633971 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)): Х 01/01/2022 and ending 12/31/2022 B Filer's tax year beginning Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$ If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Constructive Category 1 Category 2 G1 Name and address of foreign partnership 2(a) EIN (if any) TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XV 98-1612415 2(b) Reference ID number (see instructions) FEEDER, LP FLOOR 4, WILLOW HOUSE 3 Country under whose laws organized GRAND CAYMAN KY1-9010 CJ 7 Principal business 5 Principal place of 8a Functional currency Date of 6 Principal business 8b Exchange rate organization activity code number business (see instructions) activity TNVESTMENTS USD 523900 1.000000000000 06/16/2001 CJ Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the 2 Check if the foreign partnership must file: C/OUNITED STATES LOBAL MANAGEMENT, LLC Form 1042 Form 8804 X Form 1065 9 WEST 57TH STREET, 35TH FLOOR Service Center where Form 1065 is filed: NEW YORK, NY 10019 RETLE 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 foreign partnership, and the location of such books and records, if different organization, if any STMT 1 C/O CAMPBELLS CORPORATE SERVICES LTD C/O TIGER GLOBAL MANAGEMENT, LLC 5 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions X No If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Χ No Yes Were any special allocations made by the foreign partnership? Χ 7 Nο Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions 9 How is this partnership classified under the law of the country in which it's organized? TAX EXEMPTED LIMITED PARTNERS 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b X No If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. X 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. Form **8865** (2022) For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

orm 886	5 (2022)									Page Z
		of this Form 8865 clain only transaction with the fo	•	•	`	,	•	,		s No
		amount of gross receipts in its computation of foreigr		•			• .	•		
		amount of gross receipts its computation of FDDEI								
d E	Enter the	amount of gross receipts of ation of FDDEI	derived fror	m all services provid	led to the foreig	n partne	ership that the	filer includ	ded in	
13 E	Enter the i	number of foreign partners rship or of receiving a distr	subject to	section 864(c)(8) as	s a result of trans	sferring	all or a portion	of an inter	rest in	
14 A	At any tin	ne during the tax year we	re any trar	nsfers between the	partnership and	its par	tners subject to	the disc	losure	s X No
Sign Here O f You're Fili This Form Separately a Not With Yo	ng and infor	er penalties of perjury, I decla belief, it is true, correct, and o mation of which preparer has	complete. De	eclaration of preparer (d	• .				•	•
ax Return.	Sign	ature of general partner or lim	ited liability o	company member			Date			
Paid Prepare		Type preparer's name		Preparer's signatu	ıre		Date	Check self-en	if PTIN	
Jse On	Eirm'o	name						Firm's	EIN	
JSE OII	Firm's	address						Phone	no.	
		box b , enter the ninterest you constr	uctively	own. See instruc	tions.	Owns a	constructive in	terest	Check if	Check if
		Name		Adu	1655	10	entineation nui	iliber (II ali	y) foreign person	direct partner
Sched	ule A-1	Certain Partners o	f Foreigr	n Partnership (se	ee instruction	s)				
		Name		Add	ress		Identificati	on number	r (if any)	Check if foreign person
Sched	ule A-2	Foreign Partners	of Section	on 721(c) Partne	rship (see ins	structio	ns)			
Name o	f foreign tner	Address		Country of organization (if any)	U.S. taxpay identification ri (if any)	yer .	Check if relate U.S. transfe		Percentage Capital	interest Profits
									%	<u>%</u>
Does th	e partne	rship have any other for	reign perso	on as a direct partr	ner?				Yes	X No
	ule A-3		le. List a	all partnerships (foreign or do			the forei	gn partners	hip owns a
		Name		Address			EIN (if any)		Total ordinary	Check if foreign partnership
SEE S'	TATEME	NT 2								

Form 8865 (2022) Page **3**

	hedule		
Cau	tion: In	clude only trade or business income and expenses on lines 1a through 22 below. See the in	structions for more information.
	1a G	Gross receipts or sales	
		ess returns and allowances	1c
		Cost of goods sold	2
<u>e</u>	3 0	Gross profit. Subtract line 2 from line 1c	
Income			
Š		Ordinary income (loss) from other partnerships, estates, and trusts (attach statement).	
=		let farm profit (loss) (attach Schedule F (Form 1040)).	5
		let gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6
		Other income (loss) (attach statement)	7
		otal income (loss). Combine lines 3 through 7	
ŝ	9 S	alaries and wages (other than to partners) (less employment credits)	9
tion	10 G	Guaranteed payments to partners	10
for limitations)	11 F	Repairs and maintenance	11
or =		ad debts	12
ns f		Rent	13
instructions		axes and licenses	14
stru		nterest (see instructions)	15
.⊑		Depreciation (if required, attach Form 4562)	
ees)		ess depreciation reported elsewhere on return	16c
Deductions		Depletion (Don't deduct oil and gas depletion.)	17
<u>.</u>			18
걸		Retirement plans, etc.	19
ed		Employee benefit programs	
Δ		Other deductions (attach statement)	20
-		otal deductions. Add the amounts shown in the far right column for lines 9 through 20	21
		Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22
Ħ		Reserved for future use	23
Payment	24 F	Reserved for future use	24
Ž	25 F	Reserved for future use	25
	26 F	Reserved for future use	26
and	27 F	Reserved for future use	27
ā		Reserved for future use	28
Тах		Reserved for future use	29
		Reserved for future use	30
Sc	hedule		Total amount
	1	Ordinary business income (loss) (Schedule B, line 22)	1
	2	Net rental real estate income (loss) (attach Form 8825)	
	3 a		
	b		1
		0.1	3c
	4	Guaranteed _ ` ´	30
ŝ			4c
Income (Loss)	_ c		
ے	5	Interest income	5
шe	6	Dividends and dividend equivalents: a Ordinary dividends	6a
ᅙ		b Qualified dividends 6b	-
2		c Dividend equivalents . 6c	_
	7	Royalties	7
	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8
	9 a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a
	b	Collectibles (28%) gain (loss) 9b	
	C	Unrecaptured section 1250 gain (attach statement) 9c	
	10	Net section 1231 gain (loss) (attach Form 4797)	10
	11	Other income (loss) (see instructions) (1) Type (2) Amount	11(2)
က္ခ	12	Section 179 deduction (attach Form 4562)	12
Deductions	13 a		13a
돧	b		13b
			13c(2)
ᅙ	C		1100148

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Form 8	865 (202	2) TIGER GLOBAL PRIVA	ATE INVESTMENT P.	ARTNERS XV	98-161241.	5		Page 4
Sch	edule k	Partners' Distributiv	e Share Items (contin	nued)			Total amount	
- ×-	14a	Net earnings (loss) from self	f-employment .			14a		
Self- Employ-	b	Gross farming or fishing inco	ome			14b		
。 こ に こ に こ に こ に こ に こ に こ に に に に に に	С	Gross nonfarm income				14c		
	15 a	Low-income housing credit	(section 42(j)(5))			15a		
"	b	Low-income housing credit	(other)			15b		
₩	С	Qualified rehabilitation expe						
Credits	d	Other rental real estate cred		Туре		15d		
O	е	Other rental credits (see ins	tructions)	Туре		15e		
	f	Other credits (see instruction	ns)	Type		15f		
International	16	Attach Schedule K-2 (Form 8 check this box to indicate that y						
×	17a	Post-1986 depreciation adju	ustment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
돌달	С	Depletion (other than oil and	l gas)			17c		
	d	Oil, gas, and geothermal pro	operties - gross income.			17d		
돌들	е	Oil, gas, and geothermal pro	operties - deductions			17e		
	f	Other AMT items (attach sta	itement)			17f		
	18 a	Tax-exempt interest income				18a		
o	b	Other tax-exempt income .		18b				
ati	С	Nondeductible expenses		18c				
Ē	19 a	Distributions of cash and ma	arketable securities			19a		
uge	b	Distributions of other proper				$\overline{}$		
Other Information	20 a	Investment income				20a		
the	b	Investment expenses				20b		
Ó	С	Other items and amounts (a	•					
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per B	· · · · · · · · · · · · · · · · · · ·	if Item H11, page 1, is	s answered "Y			
		_	Beginning	g of tax year		End	of tax year	
		Assets	(a)	(b)	(c)		(d)	
2 a	Trade no	otes and accounts receivable.						
b	Less allo	owance for bad debts						
3	Inventor	ies						
		vernment obligations						
		npt securities						
		rrent assets (attach statement)						
		partners (or persons related to						
b	Mortgag	e and real estate loans						
8	Other in	vestments (attach statement)						
9 a	Building	s and other depreciable assets						
b	Less acc	cumulated depreciation						
10 a	Depletab	ole assets						
b	Less acc	cumulated depletion						
		et of any amortization)						
	•	le assets (amortizable only)						
h		numulated amortization	l .	1	1		1	

Page 5

	nedule L Balance Sheets per Boo	oks. (Not required	if Item H11	page 1. is	answered "Yes.	") (continued)
			g of tax year	, pago ., .e		nd of tax year
		(a)	(t	o)	(c)	(d)
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					
9 a	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					
Sc	hedule M Balance Sheets for Int	erest Allocation				
				Б.	(a)	(b)
					ginning of	End of
_					ax year	tax year
1	Total U.S. assets					
2	Total foreign assets:					
	Passive category					
	General category					
C	Other (attach statement)				l \ D - (/NI-4
SC.	hedule M-1 Reconciliation of Inco H11, page 1, is answere		SOOKS WITH	income (Loss) per Retu	i rn. (Not required it ite
	Titi, page i, is answer	eu 165. j				
_					on books this tax	
1	Net income (loss) per books		1		d on Schedule K,	
2	Income included on Schedule K,			s 1 through 11		
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		a Tax	-exempt inte	rest \$	
	and 11, not recorded on books					
	this tax year (itemize):					
	\$				ded on Schedule	
3	Guaranteed payments (other			_	13d, and 21, not	
_	than health insurance)				book income this	
4	Expenses recorded on books			year (itemize):		
	this tax year not included on		a Dep	oreciation \$ _		
	Schedule K, lines 1 through					
_	13d, and 21 (itemize):					
	Depreciation \$		0 4.1.1	l lines C = = 1	7	
a	Travel and entertainment \$				7. Subtract line 8	
5	Add lines 1 through 4					
	hedule M-2 Analysis of Partners' C	Capital Accounts	(Not require	ed if Item H	11. page 1 is an	swered "Yes.")
	•	aprila / isocaritor	<u>, </u>		Cash	
1 2	Balance at beginning of tax year Capital contributed:		O DIST			
4	-		7 Oth		Property	
	a Cash			er decreases	(itemize): \$	
2	b Property					
3	Net income (loss) per books		_			
4	Other increases (itemize): \$		8 Add	Llines 6 and	7	
					d of tax year.	
5	Add lines 1 through 4				on tax year. rom line 5	

Page 6

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

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).

	ibabilon that boodined botween ti	to toroigh partitoromp and the	ne percene netea ni cela	innie (a) tilleagii (a).	
	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				
	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				
Ť	/tad mice i tineagn e				
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance				
	during the tax year). See				
	instructions				
					0005

SCHEDULE O (Form 8865)

(Rev. October 2021)

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

Name of transferor	<u> </u>		<u> </u>				Filer's ide	ntifying number	
TIGER GLOBAL		NVESTMENT	PARTNERS 2					33971	
Name of foreign partner	•			EIN (if	• •		Reference	ID number (see ins	ructions)
TIGER GLOBAL					1612415		7044 > 4	T# \ / / 4\\0	
1a Is the partn	•	. , .		fined ii	n Regulations	section 1	./21(c)-1	` ` ' '	V 7
		al method applie			ion of soin		tuibution of	—	Yes X
	-	ty transferred o		-					Yes
		orm contribution							Yes X
		le Under Section					-/(· / · · · ·		22
	(a)	(b)	(c)		(d)		(e)	(f)	(g)
Type of property	Date of transfer	Description of property	Fair market on date of tra		Cost or other basis	Red	covery period		Gain recognized on transfer
Cash	12/31/2022		900	,000.					
Stock, notes									
receivable and									
payable, and other securities									
Inventory									
Tanaihla									
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			900	,000.					
3 Enter the tra	ansferor's perc	entage interes	t in the partner	ship: (a) Before the trans	fer (0.177 %	(b) After the trans	fer 0.10
Supplemental Info	ormation Requ	ired To Be Re	ported (see in	struction	ons):				
Part Dispos	sitions Report	able Under Se	ction 6038B			15	, ,		71.3
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition		(e) sain recognized by partnership	Depred recap recog by partr	ciation oture nized	(g) Gain allocated to partner	(h) Depreciation recapture allocati to partner
Part III Is any	transfer repor	ted on this scl	hedule subjec	t to ga	in recognition	under se	ection 904	l(f)(3) or	
section	n 904(f)(5)(F)?					<u></u>		▶ 🔼	Yes X

FORM 8865, PAGE 1 DETAIL

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

C/O CAMPBELLS CORPORATE SERVICES LTD NAME LINE 1:

ADDRESS LINE 1: FLOOR 4, WILLOW HOUSE CRICKET SQUARE

ADDRESS LINE 2: CITY: GRAND CAYMAN

COUNTRY:

POSTAL CODE: KY1-9010

ITEM H4 - CUSTODIAN OF BOOKS AND RECORDS

NAME LINE 1: C/O TIGER GLOBAL MANAGEMENT, LLC ADDRESS LINE 1: 9 WEST 57TH STREET, 35TH FLOOR

NEW YORK CITY:

STATE: NYZIP:

FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE

NAME LINE 1: TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XV,

NAME LINE 2: LP CAMPBELLS CORPORATE SERVICES LTD FLOOR 4, WILLOW HOUSE CRICKET SQUARE

ADDRESS LINE 1:

ADDRESS LINE 2: CITY: GRAND CAYMAN

COUNTRY: CJ

POSTAL CODE: KY1-9010 98-1611846

FOREIGN PARTNERSHIP: X

TIGER GLOBAL INTERMEDIARY 4, LP CAMPBELLS CORPORATE SERVICES LTD FLOOR 4, WILLOW HOUSE CRICKET SQUARE NAME LINE 1: NAME LINE 2:

ADDRESS LINE 1:

ADDRESS LINE 2: CITY: GRAND CAYMAN

COUNTRY: CJ

POSTAL CODE: KY1-9010 98-1608256 TD:

FOREIGN PARTNERSHIP:

NAME LINE 1: INTERNET FUND HOLDING VII, LTD NAME LINE 2: CAMPBELLS CORPORATE SERVICES LTD

ADDRESS LINE 1: FLOOR 4, WILLOW HOUSE

ADDRESS LINE 2: CRICKET SQUARE CITY: GRAND CAYMAN

COUNTRY: CJ

POSTAL CODE: KY1-9010 98-1572067 TD:

FOREIGN PARTNERSHIP: X

CEP SPV I, A SERIES OF CHANNEL EP, LLC NAME LINE 1:

ADDRESS LINE 1: 4291 CALLE MEJILLONES

SAN DIEGO

STATE: CA ZIP: 92130

92-0323423 TD:

Form **8865**

Department of the Treasury

Internal Revenue Service

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

Attach to your tax return.

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

, and ending

12/31/2022

OMB No. 1545-1668

Attachment Sequence No. 865

beginning 01/01/2022 Filer's identification number Name of person filing this return 58-0633971 ROBERT W. WOODRUFF ARTS CENTER, INC 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)): Χ 06/01/2022 05/31/2023 B Filer's tax year beginning and ending Other \$ Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Constructive Category 1 Category 2 G1 Name and address of foreign partnership 2(a) EIN (if any) 98-1553042 2(b) Reference ID number (see instructions) FARALLON SPECIAL SITUATIONS FUND II, LP 3 Country under whose laws organized ONE MARITIME PLAZA, SUITE 2100 SAN FRANCISCO, CA 94111 4 Date of 5 Principal place of 6 Principal business Principal business 8a Functional currency 8b Exchange rate organization activity business activity code number (see instructions) 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: **United States** Form 1042 Form 8804 Form 1065 Service Center where Form 1065 is filed: 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 foreign partnership, and the location of such books and records, if different organization, if any 5 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions Yes If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? No Yes Were any special allocations made by the foreign partnership? 7 No Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (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? 9 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b χl If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. X 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. Form **8865** (2022)

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

orm 886	5 (2022)									Page Z
		of this Form 8865 clain on transaction with the fo	•	•	`	,	`	,		No No
		amount of gross receipts its computation of foreigr		•			•			
		amount of gross receipts its computation of FDDEI								
d I	Enter the	amount of gross receipts of ation of FDDEI	derived fron	n all services provid	led to the foreig	n partne	ership that the filer	ncluded		
13 i	Enter the i	number of foreign partners rship or of receiving a distr	subject to	section 864(c)(8) as	s a result of trans	sferring	all or a portion of an	interes		
14	At any tin	ne during the tax year wents of Regulations section	re any tran	sfers between the	partnership and	its par	tners subject to the	disclos	ure	No
Sign Here C f You're Fil This Form Separately Not With Yo	ing and infor	er penalties of perjury, I decla belief, it is true, correct, and o mation of which preparer has	complete. De	eclaration of preparer (d	• .				•	owledge
Tax Return	. Sign	ature of general partner or lim	ited liability co	ompany member			Date			
Paid		Type preparer's name		Preparer's signatu	ire			Check self-emplo	if PTIN	
Prepar	□ □ i mas ! s	name						Firm's EIN	<u> </u>	
Use Or	าเу├──	address						Phone no		
		box b , enter the ninterest you constr	uctively o	own. See instruc	tions.	Owns a	constructive interes	t	Check if	Check if
		Name		Add	ress	Id	lentification number	(if any)	foreign person	direct partner
Sched	lule A-1	Certain Partners o	f Foreign	Partnership (se	ee instruction:	s)				
		Name		Add	ress		Identification nu	umber (if	f any)	Check if foreign person
Schoo	dule A-2	Foreign Partners	of Section	n 721(c) Partne	rshin (see ins	structio	ns)			
		. 0.0.g i ai ilioi o		Country of	U.S. taxpay				Percentage ir	nterest
Name o	of foreign rtner	Address		organization (if any)	identification n (if any)		Check if related to U.S. transferor		apital	Profits
				(ii airy)	(II ally)				%	%
									%	
Does th	a nartna	rship have any other for	eian perso	on as a direct partr	l				Yes	No
	dule A-3		le. List a	III partnerships (foreign or do	mestic		oreign		
		Name	an oony o	Address			EIN (if any)	To	otal ordinary come or loss	Check if foreign partnership

Sc	hedu	le B Income Statement - Trade or Business Income		
Cau	tion:	Include only trade or business income and expenses on lines 1a through 22 below. See the in	struct	tions for more information.
	1a	Gross receipts or sales1a		
		Less returns and allowances	1c	
	2	Cost of goods sold	2	
Income	3	Gross profit. Subtract line 2 from line 1c		
οū	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
nc	_	Net farm profit (loss) (attach Schedule F (Form 1040))	5	
_	5	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
	6 7	Other income (loss) (attach statement)	7	
	8	Total income (loss). Combine lines 3 through 7	8	
	9	Salaries and wages (other than to partners) (less employment credits)	9	
ons)	10	Guaranteed payments to partners.	10	
itati	11	Repairs and maintenance	11	
Ē	12		12	
s fo	13	Bad debts	13	
instructions for limitations)	14	Rent Taxes and licenses	14	
struc	15	Interest (see instructions)	15	
i	-	Depreciation (if required, attach Form 4562)	-10	
ees)		Less depreciation reported elsewhere on return	16c	
us	17	Depletion (Don't deduct oil and gas depletion.)	17	
ţ	18	Retirement plans, etc.	18	
n	19	Employee benefit programs	19	
Deductions	20	Other deductions (attach statement)	20	
	21	Total deductions. Add the amounts shown in the far right column for lines 9 through 20		
_	22	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
_	23	Reserved for future use	23	
ent	24	Reserved for future use	24	
ayment	25	Reserved for future use	25	
Рау	26	Reserved for future use	26	
	27	Reserved for future use	27	
and	28	Reserved for future use	28	
а×	29	Reserved for future use	29	
-	30	Reserved for future use		
Sc	hedu	le K Partners' Distributive Share Items		Total amount
		Ordinary business income (loss) (Schedule B, line 22)	1	
		Net rental real estate income (loss) (attach Form 8825)	2	
	;	3a Other gross rental income (loss)		
		b Expenses from other rental activities (attach statement). 3b		
		c Other net rental income (loss). Subtract line 3b from line 3a	3с	
_	4	Guaranteed payments: a Services 4a b Capital 4b		
SS		c Total. Add line 4a and line 4b	4c	
Income (Loss)		5 Interest income	5	
ě	(6 Dividends and dividend equivalents: a Ordinary dividends	6a	
Ö		b Qualified dividends 6b		
<u>2</u>		c Dividend equivalents . 6c		
	7	7 Royalties		
	1	Net short-term capital gain (loss) (attach Schedule D (Form 1065))		
	9	Pa Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a	
		b Collectibles (28%) gain (loss) 9b		
		c Unrecaptured section 1250 gain (attach statement) 9c		
	10		10	
	11		11(2)	
ns	12	, , , , , , , , , , , , , , , , , , , ,	12	
ij	13	Ba Contributions	13a	
Deductions		b Investment interest expense	13b	
Sec			13c(2)	
	-1	d Other deductions (see instructions) (1) Type (2) Amount	13d(2)	

-orm &	865 (202	(2) FARALLON SPECIAL S	SITUATIONS FUND	11, LP	98-155304	2		Page 4
Sch	edule ł	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
- Ş+	. 14a	Net earnings (loss) from sel	f-employment			14a		
	b	Gross farming or fishing inco						
Self- Employ-	С	Gross nonfarm income						
	15a	Low-income housing credit						
	b	Low-income housing credit						
its	C	Qualified rehabilitation expe						
Credits	d	Other rental real estate cred		_	00)	15d		
$\ddot{\circ}$	e	Other rental credits (see ins	,	Type		15e		
	f	Other credits (see instruction	•	Type		15f		
International	16	Attach Schedule K-2 (Form 8 check this box to indicate that y	865), Partners' Distributi	ve Share Items - Inter		101		
× ,,	17a	Post-1986 depreciation adju	ustment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
ᇐᆴ	С	Depletion (other than oil and	l gas)			17c		
JEE	d	Oil, gas, and geothermal pro	operties - gross income.			17d		
A Fig	е	Oil, gas, and geothermal pro	operties - deductions			17e		
	f	Other AMT items (attach sta	atement)			17f		
	18 a	Tax-exempt interest income				18a		
Other Information	b	Other tax-exempt income .				18b		
ati	С	Nondeductible expenses		18c				
Ē	19 a	Distributions of cash and ma	arketable securities			19a		
of L	b	Distributions of other proper	rty			19b		
_	20 a	Investment income				20a		
the	b	Investment expenses.				20b		
ō	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per I	Books. (Not required	l if Item H11, page ′	1, is answered "Y	/es.")		
			Beginnin	g of tax year		End	l of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash .							
2 a	Trade no	otes and accounts receivable.						
b	Less allo	owance for bad debts						
3	Inventor	ies						
4	U.S. Go	vernment obligations						
5	Tax-exeı	mpt securities						
6	Other cu	urrent assets (attach statement)						
		partners (or persons related to						
	partners)						
		e and real estate loans						
		vestments (attach statement)						
	U	s and other depreciable assets						
		cumulated depreciation.						
		ole assets						
		cumulated depletion						
		et of any amortization)						
		le assets (amortizable only)						
b	Less ac	cumulated amortization						

	hedule L Balance Sheets per Bo	ooks. (Not required if I	Item F	111,	page 1, is answere	d "Yes.	") (continued)
		Beginning of					ind of tax year
		(a)		(b)		(c)	(d)
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						
19 a	Loans from partners (or persons related to partners)						
	Mortgages, notes, bonds payable in 1 year or more						
20	Other liabilities (attach statement)						
21	Partners' capital accounts						
22 Sal	Total liabilities and capital	storoot Allogotion					
SC	hedule M Balance Sheets for I	iterest Allocation		1			
					(a) Beginning of		(b) End of
					tax year		tax year
4	Total II C. acceta			ŀ	10.7, 700.		1337, 700
1	Total U.S. assets			•			
	Total foreign assets: Passive category			ľ			
	General category						
	Other (attach statement)						
	hedule M-1 Reconciliation of Inc				Income (Loss) ne	r Retu	rn. (Not required if Iten
	H11, page 1, is answe				(=000) ро		(
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,	6	l		thin toy	
1	Net income (loss) per books		-		ne recorded on books not included on Sche		
2	Income included on Schedule K,			•	1 through 11 (itemize):	dule K,	
_	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,				exempt interest \$		
	and 11, not recorded on books		а	I a x-c	exempt interest \$		
	this tax year (itemize):						
	\$		7	Dodu	ctions included on S	chodulo	
3	Guaranteed payments (other				es 1 through 13d, and		
•	than health insurance)				ged against book inco		
4	Expenses recorded on books				ear (itemize):	iic tiiis	
•	this tax year not included on			,	eciation \$		
	Schedule K, lines 1 through		-	Борі	σοιατίστι ψ	-	
	13d, and 21 (itemize):						
а	Depreciation \$						
	Travel and entertainment \$		8	Add	lines 6 and 7.		
					me (loss). Subtract		
5	Add lines 1 through 4				line 5		
Scl	hedule M-2 Analysis of Partners'	Capital Accounts. (No	ot req	uire	d if Item H11, page	1, is an	iswered "Yes.")
1	Balance at beginning of tax year		6	Distr	ibutions: a Cash		
2	Capital contributed:				b Property.		
	a Cash		7	Othe	r decreases (itemize):		
	b Property						
3	Net income (loss) per books						
4	Other increases (itemize): \$						
			8	Add	lines 6 and 7		
					nce at end of tax		
5	Add lines 1 through 4				ract 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).

	ibabilon that boodined botween ti	to toroigh partitoromp and the	ne percene netea ni cela	innie (a) tilleagii (a).	
	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				
	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				
Ť	/tad mice i tineagn e				
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance				
	during the tax year). See				
	instructions				
					0005

SCHEDULE 0 (Form 8865)

(Rev. October 2021)

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

Department of the Treasury Internal Revenue Service		Go to www.irs			ructions and tl					
Name of transferor							Filer's ident	ifying number		
FARALLON SPEC	IAL SITUA	TIONS FUND	II, LP				58-063	3971		
Name of foreign partners	hip			EIN (if a	ny)		Reference I	D number (see in:	structions)	
FARALLON SPEC	IAL SITUA	TIONS FUND	II, LP	98-1	553042					
2 Was any inta	ons he gain deferra ngible proper	on 721(c) partn 	d to avoid the onsidered or	recogniti anticipa	on of gain upor	n the conti	ribution of p	property?	Yes Yes Yes	X No No
Part I Transfe	rs Reportabl	e Under Sectio	n 6038B							
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market on date of tra		(d) Cost or other basis	Reco	(e) overy period	(f) Section 704(c) allocation method	Gain r	(g) ecognized transfer
Cash	12/31/2022		820	,906.						
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			820	,906.					+	
Supplemental Infor	mation Requ	entage interest iired To Be Rep	in the partner	ship: (a)		fer	% (b) After the tran	sfer	%
(a) Type of	(b) Date of riginal transfer	(c) Date of disposition	(d) Manner of disposition		(e) nin recognized y partnership	(f) Deprec recapt recogn by partn	ation ure ized	(g) Gain allocated to partner	Depi recaptu	(h) reciation re allocated partner
2614 2 11	•	ted on this sch	•	•	•		•		Yes	X No

Form **8865**

Department of the Treasury Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return.

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

OMB No. 1545-1668

Attachment Sequence No. 865

Internal	Revenue Service	beg	inning	01/03	1/2022	, and endir	ng	12/3	1/2022		Sequence N	o. 865
Name o	of person filing this	s return				F	iler's	identifica	ation numbe	er		
ROBE	RT W. WOO	DRUFF ARTS C	ENTE	R, INC.				63397				
Filer's a	iddress (if you are	en't filing this form with	your tax	return)	A Category	of filer (see Ca	ategorie	es of Filers		ctions and check	applicable box(es	s)):
					1	2		3	X	4		
					B Filer's tax			06/01	/2022	, and ending	05/31/2	2023
		abilities: Nonrecourse			Qualified no					Other \$		
		per of a consolidated	d group	but not the	parent, enter			rmation al	bout the par	ent:		
	ame					E	EIN					
	ddress	antad anasified fore	ian fina	maial assats		on this forms	Casi					
		epted specified fore				on this form.	See II	nstruction	s			
F III	normation abou	ıt certain other partr	lers (see	e mstructions	·)					(4) Cho	ck applicable bo	v(os)
	(1) Na	ame		(2	2) Address		(3)) Identifica	tion number	Category 1	Category 2	Constructive
										Catogory 1	Outogory 2	owner
G1 N	ame and addre	ss of foreign partner	ship							2(a) EIN (if an	ıy)	
										98-1522	2095	
PC F	EEDER VI,	LP								2(b) Reference	e ID number (see	instructions)
3RD	FL, LIBER	ATION HOUSE,	CAST	TLE ST								
ST	HELIER									3 Country und	der whose law	s organized
JE	JE4 8PN									JE		
	ate of ganization	5 Principal place of business	of (6 Principal I	business ode number	7 Princ			8a Funct	ional currency	8b Exchang	je rate ructions)
		Dadiness		dollvity oc	AC HUITIDO	activit INVES	STME:	NTS	Ţ	JSD	(300 1130	i dollorio)
	2/28/2019	US		523							1.000	000000000
		wing information for				1	I. :£ 41-	- f :		£:1		
	ame, address, and annual nited States	and identification nu	imber o	r agent (ii an	y) in the			ŭ	partnership			_
							Form		Form 1065 is	m 8804	Form 1065)
						OCIVIC	oc Ocin	ter where i	01111 1000 13	med.		
3 N	ame and addre	ss of foreign partne	rship's a	agent in cour	ntry of	4 Name	and ad	ddress of p	person(s) with	n custody of the bo	ooks and records	of the
	ganization, if ar	• .	•		,					n of such books ar		
5	During the ta	x year, did the for	eign pa	rtnership pa	av or accrue	anv interes	t or r	ovalty fo	r which the	e deduction is	not	
	allowed under	section 267A? See	instruct	tions	·						Yes	No
	If "Yes," enter	r the total amount o	f the dis	allowed dedu	uctions							
6		ship a section 721(No
7		ecial allocations mad										No
8		mber of Forms 885										
_		reign Branches (FBs										
9	How is this pa	artnership classified	under	the law of th	ie country in v	which it's org	anızed	d'?				
10 a		have an interest in										
		under Regulations s)(4)(ii)? If "No," skip										X No
		the separate unit o										_A NO
b		the separate unit o 3(d)-1(b)(5)(ii)?		•						-	Yes	No
11		tnership meet both c							```			
		rship's total receipts				3250,000.			l			
	•	of the partnership's		•			s than	າ \$1 millio	n. >		Yes	☐ No
		complete Schedule				,						
For Pri	ivacy Act and I	Paperwork Reducti	on Act I	Notice, see t	he separate i	nstructions.					Form 8	865 (2022)

PC FEEDER VI, LP 98-1522095 Form 8865 (2022) Page 2 Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with 12 a respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions Yes Nο Enter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer included in its computation of foreign-derived deduction eligible income (FDDEI)........... Enter the amount of gross receipts derived from all sales of intangible property to the foreign partnership that the filer included in its computation of FDDEI Enter the amount of gross receipts derived from all services provided to the foreign partnership that the filer included in its computation of FDDEI 13 Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an interest in the partnership or of receiving a distribution from the partnership 14 At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements of Regulations section 1.707-8? 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 all if You're Filing information of which preparer has any knowledge. This Form Separately and **Not With Your** Date Signature of general partner or limited liability company member Tax Return. Date Check Print/Type preparer's name Preparer's signature if **Paid** self-employed **Preparer** Firm's name Firm's EIN Use Only Firm's address Phone no. Constructive Ownership of Partnership Interest. Check the boxes that apply to the filer. If you check Schedule A box b, enter the name, address, and U.S. taxpayer identification number (if any) of the person(s) whose interest you constructively own. See instructions. X Owns a direct interest Owns a constructive interest Check if Check if Name Address Identification number (if any) foreign direct partner Certain Partners of Foreign Partnership (see instructions) Check if Name Address Identification number (if any) foreign person Foreign Partners of Section 721(c) Partnership (see instructions) Schedule A-2 Country of organization (if any) U.S. taxpayer Percentage interest Name of foreign Check if related to U.S. transferor identification number Address partne Capital **Profits** (if anv) % % % % X Does the partnership have any other foreign person as a direct partner? No Yes Affiliation Schedule. List all partnerships (foreign or domestic) in which the foreign partnership owns a Schedule A-3

Form **8865** (2022)

Total ordinary

income or loss

EIN

(if any)

Check if

foreign

partnership

Name

Address

direct interest or indirectly owns a 10% interest.

Page 3

PC FEEDER VI, LP 98-1522095 Form 8865 (2022)

Sc	hedule E	Income Statement - Trade or Business Income		
Cau	tion: Incl	ude only trade or business income and expenses on lines 1a through 22 below. See the in	struct	tions for more information.
	1a Gr	oss receipts or sales		
		ss returns and allowances	1c	
		st of goods sold	2	
Income	3 Gr	oss profit. Subtract line 2 from line 1c	3	
οū		dinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
n		t farm profit (loss) (attach Schedule F (Form 1040)).	5	
_		t gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
			7	
		ner income (loss) (attach statement)	8	
			9	
ns)		laries and wages (other than to partners) (less employment credits)		
for limitations)		aranteed payments to partners	10	
<u>=</u>		pairs and maintenance	11	
for		d debts	12	
instructions	13 Re	nt	13	
ructi		xes and licenses	14	
inst		erest (see instructions)	15	
ees)		preciation (if required, attach Form 4562)		
s) S)		ss depreciation reported elsewhere on return	16c	
Ë	17 De	pletion (Don't deduct oil and gas depletion.)	17	
Ę	18 Re	tirement plans, etc.	18	
Deductions	19 En	nployee benefit programs	19	
De	20 Ot	her deductions (attach statement)	20	
_	21 To	tal deductions. Add the amounts shown in the far right column for lines 9 through 20	21	
	22 Or	dinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
Payment	23 Re	served for future use	23	
	24 Re	served for future use	24	
	25 Re	served for future use	25	
	26 Re	served for future use	26	
and	27 Re	served for future use	27	
×	28 Re	served for future use	28	
Тах		served for future use	29	
		served for future use	30	
Sc	hedule l			Total amount
	1	Ordinary business income (loss) (Schedule B, line 22)	1	
	2	Net rental real estate income (loss) (attach Form 8825)	2	
	3 a	Other gross rental income (loss)		
	b	Expenses from other rental activities (attach statement) . 3b		
	С	Other net rental income (loss). Subtract line 3b from line 3a	3с	
<u>(6</u>	4	payments: a Services 4a b Capital 4b		
OS:	C	Total. Add line 4a and line 4b	4c	
٦	5	Interest income	5	
me	6	Dividends and dividend equivalents: a Ordinary dividends	6a	
Income (Loss)		b Qualified dividends 6b		
₽	_	c Dividend equivalents . 6c	_	
	7	Royalties	7	
	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8	
	9 a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a	
	b	Collectibles (28%) gain (loss) 9b		
	C	Unrecaptured section 1250 gain (attach statement) 9c	40	
	10	Net section 1231 gain (loss) (attach Form 4797)	10	
	11	Other income (loss) (see instructions) (1) Type (2) Amount	11(2)	
Suc	12	Section 179 deduction (attach Form 4562)	12	
Ę	13 a		13a 13b	
		Investment interest expense		
ᅙ		Section 59(e)(2) expenditures: (1) Type (2) Amount	120/21	ı
Deductions	c		13c(2) 13d(2)	

2X1913 1.000

Form 8	865 (202	2) PC FEEDER VI, LP			98-152209	5		Page 4
Sch	edule ł	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
- Ş.	. 14a	Net earnings (loss) from self	-employment			14a		
p b e	b	Gross farming or fishing inco				14b		
Self- Employ-	С	Gross nonfarm income				14c		
	15a	Low-income housing credit (15a		
	b	Low-income housing credit (15b		
<u>it</u>	C	Qualified rehabilitation expe				15c		
Credits	d	Other rental real estate cred		T		15d		
ರ	e	Other rental credits (see ins	•	Type		15e		
	f	Other credits (see instruction	•	Type		15f		
International	16	Attach Schedule K-2 (Form 8) check this box to indicate that y	365), Partners' Distributi	ve Share Items - Internat		131		
× ,,	17a	Post-1986 depreciation adju	ıstment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
풀트	С	Depletion (other than oil and	gas)			17c		
Jag (d	Oil, gas, and geothermal pro	perties - gross income.			17d		
ĀĒ₫	е	Oil, gas, and geothermal pro	perties - deductions			17e		
	f	Other AMT items (attach sta	tement)			17f		
	18a	Tax-exempt interest income				18a		
Other Information	b	Other tax-exempt income .				18b		
	С	Nondeductible expenses				18c		
Ē	19 a	Distributions of cash and ma	arketable securities			19a		
ę	b	Distributions of other proper		19b				
Ξ	20 a	Investment income				20a		
he	b	Investment expenses				20b		
ō	С	Other items and amounts (a	ttach statement)					
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	Books. (Not required	if Item H11, page 1, i	s answered "\	'es.")		
			Beginning	g of tax year		End	l of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash .							
2 a	Trade no	otes and accounts receivable.						
b	Less allo	owance for bad debts						
		ies						
4	U.S. Go	vernment obligations						
5	Tax-exer	npt securities						
6	Other cu	ırrent assets (attach statement)						
		partners (or persons related to						
	partners)						
		e and real estate loans						
		vestments (attach statement)						
	U	s and other depreciable assets						
		cumulated depreciation						
		ole assets						
		cumulated depletion						
		et of any amortization)						
		le assets (amortizable only)						
<u>a</u>	Less acc	cumulated amortization		1				

PC FEEDER VI, LP 98-1522095 Form 8865 (2022)

Sch	edule L Balance Sheets per Boo			, page 1, is answered "\		· · · · · · · · · · · · · · · · · · ·
		Beginnin	ng of tax year		End of to	ax year
		(a)	(1	b) (c)		(d)
3	Other assets (attach statement)					
	Total assets					
	Liabilities and Capital					
	Accounts payable					
	Mortgages, notes, bonds payable in less than 1 year					
	Other current liabilities (attach statement)					
	All nonrecourse loans					
а	Loans from partners (or persons related to partners)					
b	Mortgages, notes, bonds payable in 1 year or more					
	Other liabilities (attach statement)					
	Partners' capital accounts					
2	Total liabilities and capital					
cł	edule M Balance Sheets for In	erest Allocation				
				(a)		(b)
				Beginning of		End of
				tax year		tax year
	Total U.S. assets					
	Total foreign assets:					
а	Passive category					
	General category					
С	Other (attach statement)					
cł	nedule M-1 Reconciliation of Inco	me (Loss) per	Books With	n Income (Loss) per F	eturn. (1	Not required if I
	H11, page 1, is answer	ed "Yes.")				
			6 Inco	ome recorded on books this	tax	
	Net income (loss) per books		_	r not included on Schedule		
	Income included on Schedule K.		1	s 1 through 11 (itemize):	1.5,	
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,			c-exempt interest \$		
	and 11, not recorded on books		a laz	-exempt interest φ	—	
	·		_		-	
	this tax year (itemize):					
	\$			luctions included on Sche		
	Guaranteed payments (other			ines 1 through 13d, and 21,		
	than health insurance)			rged against book income	this	
	Expenses recorded on books			year (itemize):		
	this tax year not included on		a De	oreciation \$	—	
	Schedule K, lines 1 through				—	
	13d, and 21 (itemize):		_		<u> </u>	
	Depreciation \$					
b	Travel and entertainment \$			d lines 6 and 7		
				ome (loss). Subtract line		
_	Add lines 1 through 4			m line 5		
cł	edule M-2 Analysis of Partners' (Capital Accounts.	-, 			ed "Yes.")
	Balance at beginning of tax year		6 Dis	tributions: a Cash		
	Capital contributed:			b Property		
	a Cash • • • • •		7 Oth	er decreases (itemize): \$_		
	b Property					
	Net income (loss) per books					
	Other increases (itemize): \$				_	
4	στισι ποιοασσο (ποιπίζο). ψ		8 Add	d lines 6 and 7		
				ance at end of tax y	1	
5	Add lines 1 through 4			otract 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 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				
	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				
	Rents, royalties, and license fees paid				
	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				
24	instructions				
21	Amounts loaned (enter the maximum loan balance				
	during the tax year). See				
	instructions				

SCHEDULE O (Form 8865)

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

(Rev. October 2021)

Department of the Treasury

Internal Payenus Sonico

Go to www

► 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

nternal Revenue Service		Go to www.ir	s.gov/Formooo	o for instructions a	nd the latest in			
Name of transferor							fying number	
PC FEEDER VI,				FINI (if		58-063		
Name of foreign partners	·			EIN (if any)		Reterence II	O number (see inst	ructions)
PC FEEDER VI,				98-1522095				
1a Is the partne	-		nership (as de	fined in Regulation	ons section 1.	721(c)-1T(l		🗀
	ons						—	Yes X No
	-			recognition of gain				Yes No
				anticipated to be,				.,
				n Regulations sec	tion 1.482-7(c)(1)?		Yes X No
Part I Transfe	rs Reportable	e Under Section	on 6038B					
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market on date of tra		other Rec	(e) overy period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		717	,780.				
Stock, notes								
eceivable and								
ayable, and other								
ecurities								
nventory								
,								
angible								
roperty								
sed in trade r business								
Dusiness								
ntangible								
roperty								
escribed in ection 197(f)(9)								
ntangible property,								
ther than intangible								
roperty described section 197(f)(9)								
other roperty								
торенту								
			+					
otals				,780.		200 0/ //	1	
				ship: (a) Before the	transfer 74	.390 %(b) After the trans	fer 74.390 %
Supplemental Info	rmation Requ	irea to be kep	ported (see in	structions).				
Part Disposi	itions Poport	able Under Se	ction 6039B					
Part Disposi	Itions Reports	able Officer Set	CHOII 0030B		(f)			(h)
(a) Type of	(b) Date of	(c) Date of	(d) Manner of	(e) Gain recognize	(f) Deprec d recapt		(g) Gain allocated	Depreciation
	original transfer	disposition	disposition	by partnership	recogn	ized	to partner	recapture allocated to partner
					by partn	PISITIP		το ραιτίσι
	transfa: :::::	tod op 11:1- :-!	و و العادم ما العام ما	t to goin =====:	lan under et	otion 004/f	5)(2) 0.5	
	-		=	t to gain recogni				
section	904(t)(5)(F)?						▶	Yes X No

Form **8865**

Department of the Treasury Internal Revenue Service

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

Information furnished for the foreign partnership's tax year

beginning 01/01/2022 , and ending 12/31/2022 OMB No. 1545-1668

Attachment Sequence No. 865

Name	of person filing this	return						Filer	r's identific	ation numb	er				
ROBI	ERT W. WOOD	DRUFF ARTS C	ENTE	ER, INC.				58-	-063397	1					
Filer's	address (if you are	n't filing this form with	your ta	x return)	A Categ	ory of	filer (see	Categ	ories of Filer	s in the instru	uctions and check	applicable box(e	es)):		
					1		2		3	X	4				
					B Filer's	tax ye	ar beginn	ing	06/01	/2022	, and ending	05/31/	2023		
C F	iler's share of lia	bilities: Nonrecourse	\$		Qualified	l non	ecourse	finar	ncing \$		Other \$				
D If	f filer is a membe	er of a consolidated	grou	but not the	parent, er	nter tl	ne follow	ing in	nformation a	bout the par	ent:				
N	lame							EIN							
	Address														
E C	Check if any exce	pted specified forei	gn fin	ancial assets	are report	ted on	this forn	n. Se	e instructior	าร					
F II	nformation about	certain other partn	ers (s	ee instructions	s)										
	(4) No.			,,	2) Adduses				(2) Idantifia		instructions and check applicable box(es)): 4				
	(1) Nan	ne		(2	2) Address				(3) Identifica	ation number	Category 1	Category 2			
G1 N	lame and addres	s of foreign partners	ship								2(a) EIN (if a	any)			
											98-161	9538			
RA (III, LI	Ρ					2(b) Referen	ce ID number (se	e instructions)						
PO E	BOX 39, UGL	LAND HOUSE	SOUI	CH CHURCH	I ST										
GEOF	RGE TOWN G								3 Country u	nder whose lav	vs organized				
CJ	KY-1-1104														
	4 Date of organization 5 Principal place of business 6 Principal business activity code num								business	8a Funct	(see instructions				
O	organization	business		activity co	oue mumb	ei	INVE	STN	MENTS	τ	USD	(See ins	structions)		
	0/01/2021	US		523								1.00	0000000000		
H P	Provide the follow	ing information for	the fo	oreign partner	ship's tax	year:									
	lame, address, a Inited States	nd identification nu	mber	of agent (if an	y) in the		2 Che	ck if	the foreign	partnership	must file:				
·	miled States							_	m 1042			Form 106	5		
							Serv	ice C	enter where	Form 1065 is	filed:				
	lame and addres organization, if any	s of foreign partner	ship's	agent in cour	ntry of										
U	ngamzation, ii ang	у						J. F.				,			
5	-		-		ay or acci	rue a	ny intere	est o	r royalty fo	or which the	e deduction is				
		section 267A? See i											S No		
		the total amount of													
6	-			•		-			. , ,	, , ,					
7		cial allocations mad	•	٠.	•								S No		
8															
9	How is this par	tnership classified	unde	the law of th	ne country	in wh	ich it's oi	rganiz	zed?	-					
10 a															
												Yes	S X No		
b		the separate unit or											□		
												Yes	S No		
11		nership meet both or)					
	•	ship's total receipts		•						>		 ,.			
	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.														

orm 886	5 (2022)									Page Z
		r of this Form 8865 claiming a for any transaction with the foreign part	•	, ,		,		,		es No
		amount of gross receipts derived for its computation of foreign-derived derived derive	•			• .	•			
c E	Enter the	amount of gross receipts derived fr	om all sales of intan	gible property to	the for	reign partne	ership that	t the file		
		amount of gross receipts derived from							n ——	
		ation of FDDEI								
		number of foreign partners subject to rship or of receiving a distribution fro								
14	At any tin	ne during the tax year were any trants of Regulations section 1.707-8?	ansfers between the	partnership and	its part	ners subjec	ct to the o	disclosur	е	es No
Sign Here C f You're Fili This Form Separately	ing and infor	er penalties of perjury, I declare that I ha belief, it is true, correct, and complete. I mation of which preparer has any knowled	Declaration of preparer (-					•
Not With Yo Tax Return.		ature of general partner or limited liability	company member			Date				
Paid Prepar		Type preparer's name	Preparer's signatu	ıre		Date		neck If-employ	if PTIN ed	
Use Or	nly Firm's	name						m's EIN		
	Firm's	address					Pr	one no.		
		interest you constructively a X Owns a direct interest Name				constructiv		f any)	Check if foreign	Check if
		ivaine	Add		Idi	entinication	number (i	i aily)	person	direct partner
School	dule A-1	Certain Partners of Foreig	ın Partnershin (s	ee instructions)					
Scried	iule A-I	Certain raithers or roreig		ee manachons	/					Check if
		Name	Add	lress		Identifi	cation nun	nber (if a	any)	foreign person
Sched	lule A-2	Foreign Partners of Secti				ns)				
Name o	of foreign rtner	Address	Country of organization (if any)	U.S. taxpaye identification nu (if any)		Check if r U.S. trar	elated to sferor	Pe Cap	ercentage ital	Profits Profits
									%	%
									%	%
Does th	e partne	rship have any other foreign pers						<u></u>	Yes	No
Sched	dule A-3	Affiliation Schedule. List direct interest or indirectly	all partnerships owns a 10% inte	(foreign or dor rest.	nestic) in whic	h the fo	reign	partners	hip owns a
		Name	Address			EIN (if any)	ı		al ordinary ome or los	
		<u> </u>							Form	8865 (2022

Form 8865 (2022) Page **3**

Sc	hedule	B Income Statement - Trade or Business Income		
Cau	tion: In	clude only trade or business income and expenses on lines 1a through 22 below. See the in	struct	tions for more information.
	1a (Gross receipts or sales		
		ess returns and allowances. 1b	1c	
		Cost of goods sold	2	
ē		Gross profit. Subtract line 2 from line 1c	3	
o		Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
Income		let farm profit (loss) (attach Schedule F (Form 1040)).	5	
_		let gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
			7	
		Other income (loss) (attach statement)	8	
			9	
ns)		Salaries and wages (other than to partners) (less employment credits)		
for limitations)		Guaranteed payments to partners	10	
<u>=</u>		Repairs and maintenance	11	
for		Bad debts	12	
instructions		Rent	13	
ructi	14 T	axes and licenses	14	
nst		nterest (see instructions)	15	
ees)		Depreciation (if required, attach Form 4562)		
s) (A)	b L	ess depreciation reported elsewhere on return	16c	
ä	17 D	Depletion (Don't deduct oil and gas depletion.)	17	
Ę	18 F	Retirement plans, etc.	18	
Deductions	19 E	Employee benefit programs	19	
De	20	Other deductions (attach statement)	20	
	21 T	otal deductions. Add the amounts shown in the far right column for lines 9 through 20	21	
	22 C	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
Ħ	23 F	Reserved for future use	23	
Payment	24 F	Reserved for future use	24	
	25 F	Reserved for future use	25	
	26 F	Reserved for future use	26	
and	27 F	Reserved for future use	27	
×	28 F	Reserved for future use	28	
Тах		Reserved for future use	29	
		Reserved for future use	30	
Sc	hedule			Total amount
	1	Ordinary business income (loss) (Schedule B, line 22)	1	
	2	Net rental real estate income (loss) (attach Form 8825)	2	
	3 a	` '		
	b	,		
	_ C	Cuarantood	3с	
<u> </u>	4	payments: a Services 4a b Capital 4b		
OS:	_ c		4c	
J	5	Interest income	5	
Income (Loss)	6	Dividends and dividend equivalents: a Ordinary dividends	6a	
Ö		b Qualified dividends 6b		
2		c Dividend equivalents . 6c	_	
	7	Royalties	7	
	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8	
	9 a		9a	
	b	(1 / 3 (
	1.0	7		
	10	Net section 1231 gain (loss) (attach Form 4797)	10	
	11	Other income (loss) (see instructions) (1) Type (2) Amount	11(2)	
Suc	12	Section 179 deduction (attach Form 4562)	12	
ξį	13 a		13a	
Deductions	l b		13b	
a)	C		13c(2) 13d(2)	
۵	C	LOTHER DEGLICTIONS (See Instructions) (1) Type		

2X1913 1.000

roiiii (0000 (202	2) KA CAPITAL NEAUS 1	NIEKNALIONAL FU	IND III, LP	90-101933	0		raye ¬					
Sch	edule k	Partners' Distributiv	e Share Items (conti	inued)			Total amount						
			•			14a							
Self- Employ-	b b												
S E	E c					-							
	1		ings (loss) from self-employment. Implication (sos) from self-employment. Im										
Credits			,			15c							
eq	1		**			15d							
ပ်			·			15u							
	e f	·	•			15e							
	<u> </u>	Other credits (see instruction	15)	туре		131							
International	16												
	17a	Post-1986 depreciation adju	ıstment			17a							
Alternative Minimum Tax] b	Adjusted gain or loss				17b							
필달	c c	Depletion (other than oil and	gas)			17c							
FEE	d	Oil, gas, and geothermal pro	perties - gross income			17d							
¥ <u>₽</u> ₹	e	Oil, gas, and geothermal pro	operties - deductions			17e							
	f	Other AMT items (attach sta	tement)			17f							
	18 a					18a							
o	b	Other tax-exempt income .				18b	a						
Other Information	С	Nondeductible expenses				18c							
	19 a	Distributions of cash and ma	arketable securities		19a								
of L	b	Distributions of other proper		19b									
_	20 a												
the	b	Investment expenses				20b							
Ó	С												
	21	Total foreign taxes paid or a	ccrued			21							
Sch	edule L	Balance Sheets per E	Books. (Not required	d if Item H11, page 1, is	answered "Y								
		_	Beginnin	g of tax year		End	l of tax year						
		Assets	(a)	(b)	(c)		(d)						
1	Cash												
		otes and accounts receivable .											
b	Less allo	owance for bad debts											
3		ies											
		vernment obligations											
5		mpt securities											
6		urrent assets (attach statement)											
7 a		p partners (or persons related to											
b	Mortgag	e and real estate loans											
8	Other in	vestments (attach statement)											
	U	s and other depreciable assets											
		cumulated depreciation.											
10 a	Depletab	ole assets											
		cumulated depletion											
		et of any amortization)											
	•	le assets (amortizable only)											
h	1 000 000	numulated amortization		I		1							

Sch	hedule L Balance Sheets per	Books. (Not required if	Item	H11,	page 1, is	answered "Yes.'	') (continue	d)
		Beginning of	of tax ye	ear		Е	nd of tax year	
		(a)		(b)		(c)		(d)
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							
-								
_	Loans from partners (or persons related to partners)							
	Mortgages, notes, bonds payable in 1 year or more							
20	Other liabilities (attach statement)							
21 22	Partners' capital accounts Total liabilities and capital							
		or Interest Allocation						
JUI	Balance Sheets it	interest Anocation						
					P.o.	(a) ginning of		(b) nd of
						ax year	_	rid di x year
					L.	ax year	ta	- year
1	Total U.S. assets							
2	Total foreign assets:							
	Passive category							
	General category							
	Other (attach statement)				. ,		/N.I. (
Sch	hedule M-1 Reconciliation of		oks \	Nith	Income (Loss) per Retu	rn. (Not re	quired if Item
	H11, page 1, is an	swered "Yes.")						
			6	Incor	ne recorded	on books this tax		
1	Net income (loss) per books			year	not include	d on Schedule K,		
2	Income included on Schedule K,			lines	1 through 11	(itemize):		
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		а	Tax-	exempt inte	rest \$		
	and 11, not recorded on books							
	this tax year (itemize):							
	\$		7	Dedu	ctions inclu	ded on Schedule		
3	Guaranteed payments (other			K, lin	es 1 through	n 13d, and 21, not		
	than health insurance)				_	book income this		
4	Expenses recorded on books				ear (itemize):			
	this tax year not included on		а					
	Schedule K, lines 1 through			•				
	13d, and 21 (itemize):							
а	Depreciation \$							
	Travel and entertainment \$		8	Add	lines 6 and	7		
			9			Subtract line 8		
5	Add lines 1 through 4		1					
Sch	hedule M-2 Analysis of Partne	ers' Capital Accounts. (N	lot re	quire	d if Item H	11, page 1, is an	swered "Ye	s.")
1	Balance at beginning of tax year		6	Distr	ibutions: a	Cash		
2	Capital contributed:]	50		Property.		
_	a Cash · · · · ·		7	Othe		s (itemize): \$		
	b Property		1 ′	Ciric	i acorcases	ο (ποιτιί ζο). Ψ		
3	Net income (loss) per books		1					
	Other increases (itemize): \$		1					
4	Other increases (iterrize). \$			Λ d d	lines 6 and	7		
			8					
5	Add lines 1 through 4		9			of tax year. rom line 5		
<u> </u>	Add iiiloo i tiilougii Ti I I I I I		1	Cubi	raot iiile 0 l	ioni iiilo U		0065 (0000)

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).

	ibabilon that boodined botween ti	to toroigh partitoromp and the	ne percene netea ni cela	innie (a) tilleagii (a).	
	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				
	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				
Ť	/tad mice i tineagn e				
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance				
	during the tax year). See				
	instructions				
					0005

SCHEDULE 0 (Form 8865)

(Rev. October 2021)

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

Department of the Treasury Internal Revenue Service					ie instructions t structions and t					
Name of transferor							Filer's ident	ifying number		
RA CAPITAL NE	XUS INTER	NATIONAL F	UND III,	LP			58-063	3971		
Name of foreign partners	hip			EIN (if a	any)		Reference I	D number (see ins	structions)	
RA CAPITAL NE	XUS INTER	NATIONAL F	UND III	98-	1619538					
2 Was any inta	ons he gain deferra ngible proper	on 721(c) partr 	d to avoid the considered or	recogni	tion of gain upo ated to be, at t	n the cont he time o	ribution of f the trans	property?	Yes Yes Yes	X No No
		e Under Section					<i>/</i> / /			21 110
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market on date of ti		(d) Cost or other basis	Rec	(e) overy period	(f) Section 704(c) allocation method		(g) recognized transfer
Cash	12/31/2022		500	,000.						
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			E00	0,000.						
		centage interes	t in the partne	rship: (a		fer	% ((b) After the tran	sfer	%
Part II Disposi	tions Report	able Under Se	ction 6038B							
(a) Type of	(b) Date of riginal transfer	(c) Date of disposition	(d) Manner of disposition		(e) Gain recognized by partnership	Deprec recapi recogn by partn	iation ture ized	(g) Gain allocated to partner	recaptu	(h) preciation ure allocated partner
- 14 - III	•	ted on this scl	•	•	•		•	· · · · · · · · · · · · · · · · · · ·		
section	904(f)(5)(F)?			<u> </u>				▶	Yes	X No

Form **8865**

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

, and ending 01/01/2022 12/31/2022

Attachment

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

beginning Sequence No. 865 Filer's identification number Name of person filing this return 58-0633971 ROBERT W. WOODRUFF ARTS CENTER, INC 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)): Х 06/01/2022 05/31/2023 B Filer's tax year beginning and ending Other \$ Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Constructive Category 1 Category 2 G1 Name and address of foreign partnership 2(a) EIN (if any) **2(b)** Reference ID number (see instructions) REDWOOD DRAWDOWN OFFSHORE FUND III, LP PO BOX 31106, 89 NEXUS WAY 3 Country under whose laws organized CAMANA BAY GRAND CAYMAN 31106 CJ 5 Principal place of 7 Principal business Date of 6 Principal business 8a Functional currency 8b Exchange rate organization business activity code number (see instructions) activity TNVESTMENTS USD 523900 US 1.000000000000 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: **United States** Form 8804 Form 1042 Form 1065 Service Center where Form 1065 is filed: 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 foreign partnership, and the location of such books and records, if different organization, if any 5 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions X No If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Х No Yes Were any special allocations made by the foreign partnership? Χ 7 Nο Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (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? 9 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b χl If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. X 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. Form **8865** (2022) For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

_	 		

Form 8865	(2022)											Page Z
		of this Form 8865 clain	•	•	,	,	•		,		es	No
		amount of gross receipts its computation of foreign		•			• .	•				
c Er	nter the	amount of gross receipts its computation of FDDEI	derived from	n all sales of intan	gible property to	the fo	reign pa	artnership th	at the fil			
d Er	nter the	amount of gross receipts	derived from	all services provid	ded to the foreig	n partne	ership th	nat the filer		in		
		ation of FDDEI								<u> </u>		
		number of foreign partners rship or of receiving a distr										
		ie during the tax year we										
		nts of Regulations section									es	X No
Sign Here On if You're Filin This Form Separately a	g and inform	er penalties of perjury, I decla pelief, it is true, correct, and a mation of which preparer has	complete. Dec	claration of preparer (ge
Not With You Tax Return.		ature of general partner or lim	nited liability con	mpany member			— Da	te				
Paid		Type preparer's name		Preparer's signature				Date Check if PTIN self-employed				
Prepare Use Onl	□ □ i maa!a	name							Firm's EIN	'		
036 0111	Firm's	address							Phone no.			
		box b , enter the n interest you constr	uctively o		ctions.			ictive interes	• /	Check if	.,,	heck if
		Name		Add	ress	Id	entificat	tion number	(if any)	foreign person	(direct partner
Schedu	ıle A-1	Certain Partners o	of Foreign	Partnership (se	ee instruction	s)					Ш.	
		Name			ress		Ide	ntification n	umber (if	any)	fo	heck if oreign person
											+	
Schedu	ıla A 2	Foreign Partners	of Section	1721(c) Partne	rehin (see ins	tructio	ne)					
			OI Section	Country of	U.S. taxpa			:£	Р	ercentage	intere	st
Name of parti	ner	Address		organizátion (if any)	identification n		U.S.	if related to transferor	Car			ofits
				\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	, , ,					%		%
										%		%
Does the	partne	ship have any other for	• •						<u></u>	Yes		No
Schedu	ıle A-3	Affiliation Schedu direct interest or in	le. List al directly ov	l partnerships (wns a 10% inte	(foreign or do rest.	mestic	c) in w	hich the	foreign	partners	ship c	wns a
		Name		Address			(if	EIN any)	To	tal ordinar ome or los	y fo	heck if oreign rtnership
											+-	
			1			l					0061	E (2222)

Sc	hedule E	Income Statement - Trade or Business Income		
Cau	tion: Incl	ude only trade or business income and expenses on lines 1a through 22 below. See the in	struct	ions for more information.
	1a Gr	oss receipts or sales		
		ss returns and allowances. 1b	1c	
			2	
و	2 00	st of goods sold	3	
Income		oss profit. Subtract line 2 from line 1c	4	
ည		dinary income (loss) from other partnerships, estates, and trusts (attach statement)		
=	5 Ne	t farm profit (loss) (attach Schedule F (Form 1040))	5	
		t gain (loss) from Form 4797, Part II, line 17 (attach Form 4797)	6	
		ner income (loss) (attach statement)	7	
	8 To	tal income (loss). Combine lines 3 through 7	8	
(s)	9 Sa	laries and wages (other than to partners) (less employment credits)	9	
for limitations)	10 Gu	aranteed payments to partners	10	
nita		pairs and maintenance	11	
<u>≓</u>		d debts	12	
		nt	13	
instructions	-	xes and licenses	14	
stru		erest (see instructions)	15	
Ë		preciation (if required, attach Form 4562)	. •	
ees)		ss depreciation reported elsewhere on return	16c	
ટ			17	
<u>ō</u>		pletion (Don't deduct oil and gas depletion.)		
걸		tirement plans, etc.	18	
Deductions		pployee benefit programs	19	
۵		ner deductions (attach statement)	20	
\dashv		tal deductions. Add the amounts shown in the far right column for lines 9 through 20		
-		dinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
=		served for future use	23	
Payment	24 Re	served for future use	24	
<u> </u>	25 Re	served for future use	25	
	26 Re	served for future use	26	
and	27 Re	served for future use	27	
<u>a</u>		served for future use	28	
Тах		served for future use	29	
		served for future use	30	
Sc	hedule ł	Partners' Distributive Share Items		Total amount
	1	Ordinary business income (loss) (Schedule B, line 22)	1	
	2	Net rental real estate income (loss) (attach Form 8825)	2	
	3 a	Other gross rental income (loss)		
	b	Expenses from other rental activities (attach statement). 3b		
	c	Other net rental income (loss). Subtract line 3b from line 3a	3с	
	4	Guaranteed I I		
ŝ	c	payments: a Services 4a b Capital 4b Total. Add line 4a and line 4b b Capital 4b	4c	
Income (Loss)	5	Interest income	5	
=	6	Dividends and dividend equivalents: a Ordinary dividends	6a	
Ĕ	"	b Qualified dividends 6b	Va	
8				
_				
_	_	c Dividend equivalents . 6c	7	
_	7	Royalties	7	
-	8	Royalties	8	
-	8 9 a	Royalties		
-	8 9 a b	Royalties	8	
-	8 9 a b c	Royalties	8 9a	
-	8 9 a b	Royalties Net short-term capital gain (loss) (attach Schedule D (Form 1065)) Net long-term capital gain (loss) (attach Schedule D (Form 1065)) Collectibles (28%) gain (loss) Unrecaptured section 1250 gain (attach statement) Net section 1231 gain (loss) (attach Form 4797)	8 9a 10	
<u>-</u>	8 9 a b c	Royalties	8 9a	
	8 9 a b c	Royalties	8 9a 10	
	8 9a b c 10	Royalties	8 9a 10 11(2)	
	8 9a b c 10 11	Royalties	8 9a 10 11(2) 12	
Deductions	8 9 a b c 10 11 12 13 a	Royalties Net short-term capital gain (loss) (attach Schedule D (Form 1065)) Net long-term capital gain (loss) (attach Schedule D (Form 1065)) Collectibles (28%) gain (loss) Unrecaptured section 1250 gain (attach statement) Net section 1231 gain (loss) (attach Form 4797) Other income (loss) (see instructions) (1) Type Section 179 deduction (attach Form 4562) Contributions Investment interest expense	8 9a 10 11(2) 12 13a	

	7000 (202	-/ KEDNOOD DIGINDONIN C	TENTONE FOND II	,				raye 🕶				
Sch	edule k	Partners' Distributiv	e Share Items (cont	inued)			Total amount					
						14a						
per se	b											
Self- Employ-	c											
	1	_										
its	1		•									
Credits	1					-						
Ö		Other rental credits (see ins	,	Type		-						
	f	Other credits (see instruction	•									
International	16	Attach Schedule K-2 (Form 88	365), Partners' Distribut	ive Share Items - Internati								
	17a	Post-1986 depreciation adju	ıstment			17a						
Alternative Minimum Tax	b	Adjusted gain or loss				17b						
重	С	Depletion (other than oil and	gas)			17c						
Jag Jage	d					17d						
Ā₽Ş	e					17e						
	T											
_	1											
Other Information	b	•	Total amount (loss) from self-employment, 14a 14b 14d 14d									
	С											
orr	19a											
<u>r</u>												
er	1					-						
Ħ	1					200						
O	21					21						
Sch	edule L	Ralance Sheets per F	Rooks (Not required	l if Item H11 nage 1 is	answered "Y							
OCII	caule E	Bularioc Officets per L	<u> </u>				l of tax vear					
		Assets			(c)							
1	Cash		(α)	(5)	(6)		(4)					
-		otes and accounts receivable										
		owance for bad debts										
3		ies										
4	U.S. Gov	vernment obligations										
5	Tax-exer	mpt securities										
6	Other cu	rrent assets (attach statement)										
7 a	Loans to	partners (or persons related to										
	partners))										
		e and real estate loans										
		vestments (attach statement)										
		s and other depreciable assets										
		cumulated depreciation.										
		ole assets										
		cumulated depletion										
		et of any amortization)										
	•	le assets (amortizable only)										

Sch	nedule L Balance Sheets per	r Books. (Not required if	Item	H11,	page 1, is	answered "Yes."	") <i>(</i> cc	ontinued)
		Beginning of	of tax ye	ear		E	nd of	tax year
		(a)		(b))	(c)		(d)
13	Other assets (attach statement)							
14	Total assets							
	Liabilities and Capital							
15	Accounts payable							
16	Mortgages, notes, bonds payable in less than 1 yea							
17	Other current liabilities (attach statement							
18	All nonrecourse loans							
19 a	Loans from partners (or persons related to partners							
_	Mortgages, notes, bonds payable in 1 year or more							
20	Other liabilities (attach statement)							
21	Partners' capital accounts							
22	Total liabilities and capital							
Sch	hedule M Balance Sheets for	or Interest Allocation						
						(a)		(b)
					Вед	ginning of		End of
					ta	ax year		tax year
1	Total U.S. assets							
2	Total foreign assets:							
а	Passive category							
	General category							
c	Other (attach statement)							
Sch	hedule M-1 Reconciliation of		oks \	N ith	Income (Loss) per Retu	ırn. (Not required if Item
	H11, page 1, is an	swered "Yes.")						
			6	Incon	ne recorded	on books this tax		
1	Net income (loss) per books			year	not included	d on Schedule K,		
2	Income included on Schedule K,			lines	1 through 11	(itemize):		
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		a Tax-exempt interest \$			rest \$		
	and 11, not recorded on books							
	this tax year (itemize):							
	\$		7	7 Deductions included on Schedul				
3	Guaranteed payments (other			K, lin	es 1 through	13d, and 21, not		
	than health insurance)			charç	ged against	book income this		
4	Expenses recorded on books			tax ye	ear (itemize):			
	this tax year not included on		а	Depr	reciation \$ _			
	Schedule K, lines 1 through							
	13d, and 21 (itemize):							
	Depreciation \$							
b	Travel and entertainment \$		8			7		
_			9			Subtract line 8		
5	Add lines 1 through 4		1-4	from	line 5	44 4 :		
Sch	hedule M-2 Analysis of Partne	ers Capital Accounts. (N					iswei	eu res.")
1	Balance at beginning of tax year		6	Distr		Cash		
2	Capital contributed:					Property		
	a Cash · · · · ·		7	Othe	er decreases	s (itemize): \$		
	b Property		-					
3	Net income (loss) per books							
4	Other increases (itemize): \$							
			8			7		
_	Add lines 4 through 4		9			d of tax year.		
5	Add lines 1 through 4	es 1 through 4		Subt	iaci iine 8 ff	rom line 5		

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

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).

		<u> </u>	<u>'</u>	() 3 ()	
	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				
	Sales of property rights (patents,				
3	trademarks, etc.) 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				
	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance during the tax year). See				
	instructions				
					F 0065 (0000)

SCHEDULE 0 (Form 8865) (Rev. October 2021)

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

Department of the Treasury Internal Revenue Service		Go to www.irs			ructions and the					
Name of transferor			_				Filer's ident	ifying number		
REDWOOD DRAWD	OWN OFFSH	ORE FUND I	II, LP				58-063	3971		
Name of foreign partners				EIN (if ar	ıy)		Reference I	D number (see in	structions)	
REDWOOD DRAWD	OWN OFFSH	ORE FUND I	II, LP				001			
2 Was any inta	ons he gain deferra ngible proper	on 721(c) partn	to avoid the onsidered or a	recogniti anticipa	on of gain upor	n the conti	ribution of the trans	property?	Yes Yes Yes	X No No X No
		e Under Sectio		rregui	2110113 30011011	1.402-7(0	<u>// </u>		163	A NO
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market von date of tra		(d) Cost or other basis	Reco	(e) overy period	(f) Section 704(c) allocation metho		(g) recognized transfer
Cash	12/31/2022		2,400,	000.						
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			2,400,	000					+	
3 Enter the train Supplemental Infor	rmation Requ		in the partner orted (see in	ship: (a)		fer	% ((b) After the tran	isfer	%
(a) Type of	(b) Date of riginal transfer	(c) Date of disposition	(d) Manner of disposition		(e) in recognized / partnership	(f) Deprec recapt recogn by partn	ation ure ized	(g) Gain allocated to partner	recapti	(h) preciation ure allocated partner
2614 2 11	-	ted on this sch	•	•	•		•		Yes	X No

Form **8865**

Department of the Treasury

Internal Revenue Service

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

Attach to your tax return.

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

12/31/2022

OMB No. 1545-1668

Attachment Sequence No. 865

01/01/2022 Filer's identification number Name of person filing this return 58-0633971 ROBERT W. WOODRUFF ARTS CENTER, INC 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)): Χ 06/01/2022 05/31/2023 B Filer's tax year beginning and ending Other \$ Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Constructive Category 1 Category 2 G1 Name and address of foreign partnership 2(a) EIN (if any) **2(b)** Reference ID number (see instructions) ANCHORAGE CREDIT OPPS OFS FUND VIII (B), LP 190 ELGIN AVENUE 3 Country under whose laws organized GEORGE TOWN GRAND CAYMAN KY1-9008 CJ 5 Principal place of 7 Principal business Date of 6 Principal business 8a Functional currency 8b Exchange rate organization business activity code number (see instructions) activity TNVESTMENTS USD 523900 08/09/2022 US 1.000000000000 Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the 2 Check if the foreign partnership must file: **United States** Form 8804 Form 1042 X Form 1065 Service Center where Form 1065 is filed: 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 foreign partnership, and the location of such books and records, if different organization, if any 5 During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions X No If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Χ No Yes Were any special allocations made by the foreign partnership? Χ 7 Nο Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (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? 9 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b χl If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. X 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. Form **8865** (2022) For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.

Form 8865 (2	2022)			. , ,							Page 2
		of this Form 8865 clain any transaction with the fo									s No
		amount of gross receipts its computation of foreigr		ū			• .	•			
c Ente	er the a	amount of gross receipts its computation of FDDEI	derived fron	n all sales of intai	ngible property t	o the	foreign pa	artnership th	at the fi		
d Ente	er the a	amount of gross receipts of ation of FDDEI	derived from	all services provi	ded to the foreig	gn part	tnership th	nat the filer	included	in	
13 Ente	er the n	number of foreign partners ship or of receiving a distr	subject to s	section 864(c)(8) a	as a result of tran	sferrin	g all or a	portion of ar	n interest		
		e during the tax year we nts of Regulations section								re Ye	s X No
Sign Here Only if You're Filing This Form Separately and Not With Your	and b	or penalties of perjury, I decla pelief, it is true, correct, and of mation of which preparer has	complete. Dec	claration of preparer (•
Tax Return.	Signa	ature of general partner or lim	ited liability co	mpany member			Da	ite			
Paid Preparer	Print/1	ype preparer's name		Preparer's signat	ure		Date		if PTIN		
•	se Only Firm's name						'		Firm's EIN		
Schedule A Constructive Ownership of Partnership Interest. Check the boxes that apply to									Phone no.	e filer If	vou check
		box b , enter the national interest you constr	ame, addr uctively o	ress, and U.S.	taxpayer iden ctions.	ntifica	ition nur	mber (if a	ny) of t		
		a X Owns a dire	ct interest	Add	b			uctive interes		Check if foreign	Check if direct
										person	partner
Schedul	e A-1	Certain Partners o	f Foreign	Partnership (s	see instruction	s)					
		Name		Ado	dress		Ide	ntification n	umber (if	any)	Check if foreign person
Oakadad	- 4 0	Faraian Dartmana	of Coetion	724/a) Doutes	rehin (ooo in	atri i at	iona)				
Schedul		Foreign Partners	oi Sectioi	Country of	U.S. taxpa				Т	ercentage	interest
Name of for partne	oreign er	Address		organization (if any)	identification r	numbe	r Check U.S.	if related to transferor		pital	Profits
				()	(a)				- '	%	9/
										%	%
Does the p	partner	ship have any other for	reign perso	n as a direct part	ner?				[Yes	No
Schedul	e A-3	Affiliation Schedu direct interest or in	le. List al directly o	l partnerships wns a 10% inte	(foreign or do erest.	omes	tic) in w	hich the	foreign	partners	hip owns a
Name				Address			E (if	EIN any)	To	tal ordinary ome or loss	Check if foreign partnership

Sc	hedu	le B Income Statement - Trade or Business Income		
Cau	ıtion:	Include only trade or business income and expenses on lines 1a through 22 below. See the in	struct	ions for more information.
	1a	Gross receipts or sales		
		Less returns and allowances. 1b	1c	
for limitations) Income	2	Cost of goods sold	2	
	3	Gross profit. Subtract line 2 from line 1c	3	
Ö	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
nc	_		5	
_	5	Net farm profit (loss) (attach Schedule F (Form 1040)).	6	
	6	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	7	
	7	Other income (loss) (attach statement)		
	8	Total income (loss). Combine lines 3 through 7	8	
(SL	9	Salaries and wages (other than to partners) (less employment credits)	9	
atio	10	Guaranteed payments to partners	10	
<u>ii</u>	11	Repairs and maintenance	11	
for	12	Bad debts	12	
instructions	13	Rent	13	
'Tcti	14	Taxes and licenses	14	
inst	15	Interest (see instructions)	15	
ees)		Depreciation (if required, attach Form 4562)		
Š	b	Less depreciation reported elsewhere on return	16c	
Ö	17	Depletion (Don't deduct oil and gas depletion.)	17	
둉	18	Retirement plans, etc.	18	
Deductions	19	Employee benefit programs	19	
Ď	20	Other deductions (attach statement)	20	
	21	Total deductions. Add the amounts shown in the far right column for lines 9 through 20	21	
	22	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
Ħ	23	Reserved for future use	23	
Payment	24	Reserved for future use	24	
Š	25	Reserved for future use	25	
	26	Reserved for future use		
and	27	Reserved for future use		
×	28	Reserved for future use		
Тах	29	Reserved for future use	29	
	30	Reserved for future use	30	
Sc		le K Partners' Distributive Share Items		Total amount
		1 Ordinary business income (loss) (Schedule B, line 22)	1	
		Net rental real estate income (loss) (attach Form 8825)	2	
	3	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	
ŝ		4 Guaranteed payments: a Services 4a b Capital 4b	_	
Ö		c Total. Add line 4a and line 4b	4c	
٦	. .	5 Interest income	5	
Income (Loss)	•	6 Dividends and dividend equivalents: a Ordinary dividends	6a	
S		b Qualified dividends 6b		
드		c Dividend equivalents . 6c	_	
		7 Royalties	7	
		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) 9b		
		c Unrecaptured section 1250 gain (attach statement) 9c	40	
	10		10	
	11		11(2)	
Deductions	12	, , , , , , , , , , , , , , , , , , , ,	12	
cţi	13	3a Contributions	13a	
ğ		b Investment interest expense	13b	
Ö		c Section 59(e)(2) expenditures: (1) Type (2) Amount d Other deductions (see instructions) (1) Type (2) Amount	13c(2) 13d(2)	

OIIII	0000 (202	2) ANCHURAGE CREDIT C	PER OFS FOND VI	LII (Β), ПР				raye 1
Sch	edule k	Partners' Distributiv	e Share Items (cont	inued)			Total amount	
- ×	_ 14a	Net earnings (loss) from self	-employment			14a		
p g	b	Gross farming or fishing inco				14b		
Self- Employ-	= c	Gross nonfarm income				14c		
	15 a	Low-income housing credit (15a		
	b	Low-income housing credit (15b		
Credits	С	Qualified rehabilitation expe				15c		
ē	d	Other rental real estate cred		Type	•	15d		
ပ	e	Other rental credits (see ins	,	Type		15e		
	f	Other credits (see instruction	•	Type		15f		
International	16	Attach Schedule K-2 (Form 88 check this box to indicate that y	865), Partners' Distribut	tive Share Items - Interna				
×	17a	Post-1986 depreciation adju	stment			17a		
Alternative Minimum Tax	b	Adjusted gain or loss				17b		
ള	С	Depletion (other than oil and	gas)			17c		
E E E	d	Oil, gas, and geothermal pro		17d				
45	е	Oil, gas, and geothermal pro	17e					
	f	Other AMT items (attach sta	tement)			17f		
	18a	Tax-exempt interest income				18a		
o	b	Other tax-exempt income .				18b		
ati	С	Nondeductible expenses				18c		
Ē	19 a	Distributions of cash and ma				19a		
윺	b	Distributions of other proper		19b				
Other Information	20 a	Investment income				20a		
ţ	b	Investment expenses				20b		
0	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	, , , , , , , , , , , , , , , , , , , ,		is answered "\			
				ng of tax year		End	l of tax year	
		Assets	(a)	(b)	(c)		(d)	
		otes and accounts receivable.						
		owance for bad debts						
		ies						
		vernment obligations						
		mpt securities						
		urrent assets (attach statement)						
		p partners (or persons related to						
	•	e and real estate loans						
		vestments (attach statement)						
		s and other depreciable assets						
	-	cumulated depreciation.						
		ole assets						
		cumulated depletion						
		et of any amortization)						
		le assets (amortizable only)						
b	Less acc	cumulated amortization						

Sch	nedule L Balance Sheets per E	Books. (Not required if	Item H11	, page 1, is answered "Yes	.") (continued)
		Beginning o	f tax year	E	End of tax year
		(a)	(b	(c)	(d)
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				
19 a	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				
Sci	nedule M Balance Sheets for	Interest Allocation		1	
				(a)	(b)
				Beginning of	End of
				tax year	tax year
1	Total U.S. assets				
2	Total foreign assets:				
	Passive category				-
	General category				+
	Other (attach statement)			Incomo (Loss) por Pot	urn (Not required if Item
SCI	H11, page 1, is answ		OKS WILLI	ilicollie (Loss) pei Keti	urri. (Not required it item
	Tiri, page 1, 10 ansv	voica 105. j			
1	Net income (loss) per books		_	me recorded on books this tax	
2	Income included on Schedule K.		1	not included on Schedule K, 1 through 11 (itemize):	
2	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,			-exempt interest \$	
	and 11, not recorded on books		a lax	-exempt interest \$	•
	this tax year (itemize):				
	\$		7 Ded	uctions included on Schedule	
3	Guaranteed payments (other			nes 1 through 13d, and 21, not	
	than health insurance)			ged against book income this	
4	Expenses recorded on books			ear (itemize):	
	this tax year not included on			reciation \$	
	Schedule K, lines 1 through				
	13d, and 21 (itemize):				
а	Depreciation \$				
b	Travel and entertainment \$			lines 6 and 7	
				ome (loss). Subtract line 8	
5	Add lines 1 through 4			n line 5	
Scl	nedule M-2 Analysis of Partners	s' Capital Accounts. (N			·
1	Balance at beginning of tax year		6 Dist	ributions: a Cash	
2	Capital contributed:			b Property	
	a Cash · · · · ·		7 Oth	er decreases (itemize): \$	
	b Property		 		
3	Net income (loss) per books		 		
4	Other increases (itemize): \$				
				lines 6 and 7	
_	Add lines 1 through 1			ance at end of tax year.	
_5	Add lines 1 through 4		Sub	tract line 8 from line 5	1

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

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).

tran	nsaction that occurred between the 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				, , , , , , , , , , , , , , , , , , ,
	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				
a	Add lines 1 through 8				
_	Add lines I through 0				
10	Purchases of inventory				
11	Purchases of tangible property other than inventory				
12	Purchases of property rights				
12	(patents, trademarks, etc.)				
13	Compensation paid for				
	technical, managerial,				
	engineering, construction, or				
	like services				
14	Commissions paid				
15	Rents, royalties, and license fees paid				
17	Interest paid				
18	Other				
10	Add lines 10 through 18				
	Amounts borrowed (enter the				
20	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 (2022)

SCHEDULE O (Form 8865)

(Form 8865) (Rev. October 2021) 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.gov/Form886	5 for instruct	ons and the	e latest inf						_	
Name of transferor							Filer's ident	ifying numb	oer				
ANCHORAGE CRE		OFS FUND	VIII (B), I					58-0633971					
Name of foreign partners	ship			EIN (if any)			Reference I	D number (see ins	tructions)		
ANCHORAGE CRE							002						
1a Is the partne	•	. , .		-		ection 1.7	'21(c)-1T((b)(14))?					
									Щ	Yes		Νo	
	-		lied to avoid the	-	-					Yes	I	Νo	
2 Was any inta	angible proper	ty transferred	d considered or	anticipated t	o be, at the	e time of	the trans	fer or at					
			tion as defined i	n Regulation	s section 1	.482-7(c)	(1)?			Yes	X	No_	
Part I Transfe	ers Reportabl	e Under Sec	tion 6038B					1					
Type of property	(a) Date of transfer	(b) Description of property	of Fair market on date of tra	I	(d) cost or other basis	Reco	(e) very period	Section allocation	704(c)		(g) recognized transfer		
Cash	12/31/2022		1,790	,018.									
Stock, notes													
receivable and													
payable, and other													
securities													
Inventory													
involtiory													
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			1,790					(1.) 4.5					
			est in the partner		re the transfe	er	% ((b) After th	e trans	sfer		<u>%</u>	
Supplemental Info	rmation Requ	iirea to Be R	eported (see in	structions):									
Day II Diamas	itiana Banant		C000D									—	
Part Dispos	itions Report	able Under S	Section 6038B			(f)				1			
_ (a)	(b)	(c)	(d)	(6		(f) Deprecia	ation	(g)		Der	(h) preciation		
Type of property of	Date of original transfer	Date of disposition	Manner of disposition	Gain red by part		recaptı recogni	zed	Gain alloca to partne		recapt	ure allocate	d	
			·		'	by partne	rship			to	partner	—	
												—	
												—	
				<u> </u>	.,,			5) (0)				—	
26:14 - 11	•		schedule subjec	•	•		•	, , ,					
section	904(t)(5)(F)?							<u>▶</u>		Yes	Х	No.	

Electronic Filing Information: PDF attachments Included in this Return

Tax Year:2022Jurisdiction:FederalName:ROBERT W. WOODRUFNo of Attachments:1

Return No: E3370FZ2

PDF Attachment Description	PDF File Name	File Size
8453 Signature Document	E3370FZ2 FE 8865s pdf	233.410

Form **8865**

Department of the Treasury Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return.

Go to www.irs.gov/Form8865 for instructions and the latest information. Information furnished for the foreign partnership's tax year beginning 01/01/2022 , and ending

12/31/2022

OMB No. 1545-1668

Attachment Sequence No. 865

Name of person filing this return								Filer's identification number						
ROBE	RT W. WOO	DRUFF ARTS C	ENTER, IN	IC.			58-0633971							
Filer's a	iddress (if you are	en't filing this form with	your tax return)	1	_	ory of	filer (see Ca	atego	_		ctions and check	applicable box(es	s)):	
				L	1		2		3	X	4			
							ar beginnin	-	01/01	/2022	, and ending	12/31/2	2022	
		abilities: Nonrecourse	<u>'</u>				ecourse fi				Other \$			
		er of a consolidated	I group but no	t the pa	arent, er	nter th		_	formation a	bout the par	ent:			
	ame							IN						
	ddress	epted specified fore	ian financial a	ccotc a	ro roport	tod on	thic form	500	o inetruction	nc				
		t certain other partn			те героп	led on	uns ionii.	366	z IIISII UCIIOI	15				
	normation abou	t certain other parti	013 (300 1113114)	Ctions)							(4) Ch	x(es)		
	(1) Na	me		(2)	Address			- ((3) Identifica	tion number	Category 1	Category 2	Constructive	
													OWITE	
G1 N	ame and addres	ss of foreign partners	ship								2(a) EIN (if a	ny)		
											98-131	9473		
											2(b) Reference	e ID number (see	instructions)	
	=	LIER & RICE	· · · · · · · · · · · · · · · · · · ·	ĹΡ										
	75 PARK AVENUE, 18TH FLOOR										1	der whose law	s organized	
	NEW YORK, NY 10152						7 Princi	inall	husinoss	9a Eunat	CJ ional currency	8b Exchang	uo roto	
	4 Date of organization 5 Principal place of business 6 Principal business 6 Principal business					er	activit INVES				JSD		ructions)	
07/01/2017 CJ 523900												1.000	000000000	
H P	rovide the follow	ving information for	the foreign pa	artnersh	nip's tax y	year:								
	ame, address, a nited States	and identification nu	imber of agent	(if any)	in the		2 Check	k if t	the foreign	partnership				
U	miled States								m 1042		_	X Form 1065	5	
						Service Center where Form 1065 is filed:								
- 2 N	ame and addres	ss of foreign partne	rehin'e agent in	countr	v of	EFILE 4 Name and address of person(s) with custody of the books and records of the							of the	
	ganization, if ar	• .	ramp a agont in	Count	y Oi						n of such books a			
		SIMI I												
MAPL	ES & CALD	ER												
5	During the tax	x year, did the fore	eign partnersh	ip pav	or accr	rue ar	nv interes	t or	rovalty fo	r which the	e deduction is	not		
•	-	section 267A? See										Yes	X No	
	If "Yes," enter	the total amount of	the disallowed	d deduc	tions .							\$		
6		ship a section 721(d										Yes		
7	Were any spe	cial allocations mad	le by the foreig	n partne	ership?							Yes	X No	
8		nber of Forms 885 reign Branches (FBs)												
9		rtnership classified											ERSHIP	
10 a	Does the filer	have an interest in	the foreign pa	rtnersh	nin oran	n inter	rest indire	ctly	through th	ne foreian n	artnershin tha	t's a		
	separate unit	under Regulations s (4)(ii)? If "No," skip o	ection 1.1503	s(d)-1(b)(4) or p	oart o	f a combi	ned	separate ι	unit under F	Regulations sec	ction	X No	
b		the separate unit of											_	
	section 1.1503	3(d)-1(b)(5)(ii)?										Yes	No	
11	•	nership meet both o	-	•										
	•		•					a 41.	on (*1:!!!	_ >		Yes	X No	
		of the partnership's complete Schedules			u or the	ıax ye	ar was ies	s tha	an \$1 millio	". J · ·		165		
For Pri		Paperwork Reduction			e separa	te ins	tructions.					Form 8	865 (2022)	

CHAITON, DUBILITER & RICE FUND A, LP

Form 8865 ((2022)											Page Z
		of this Form 8865 clain of the form of the	•	•	`	,	•		,		⁄es	No
		amount of gross receipts its computation of foreign		•			• .	•				
c Ent	ter the	amount of gross receipts its computation of FDDEI	derived from	n all sales of intan	gible property to	the fo	reign pa	artnership th	at the fi			
d Ent	ter the	amount of gross receipts	derived from	all services provid	ded to the foreig	n partne	ership th	at the filer		in		
		ation of FDDEI								<u> </u>		
		number of foreign partners rship or of receiving a distr										
		ne during the tax year we										
		nts of Regulations section									es/	X No
Sign Here Only if You're Filing This Form Separately and	and infori	er penalties of perjury, I decla pelief, it is true, correct, and mation of which preparer has	complete. Dec	claration of preparer (∍dge
Not With Your Tax Return.	r Signature of general partner or limited liability company member Date											
Paid		Гуре preparer's name		Preparer's signatu	ıre		Date		Check self-emplo	if PTIN	I	
Preparer Use Only	Firmeste	name							Firm's EIN			
OSC OIIIy		address							Phone no.			
		box b , enter the n interest you constr	uctively o		ctions.			ctive interes	•	Check i		Check if
		Name		Add	ress	Id	entificat	tion number	(if any)	foreign person	ı	direct partner
Schedul	le A-1	Certain Partners o	of Foreign	Partnership (se	ee instructions	s)					\perp	
		Name			ress		Ider	ntification n	umber (if	any)		Check if foreign person
											\perp	
Schedu	lo A-2	Foreign Partners	of Section	n 721(c) Partne	rehin (see ins	tructio	ne)					
			OI OCCIIOI	Country of	U.S. taxpay			if valated to	Р	ercentag	e inter	rest
Name of f partne	er er	Address		organizátion (if any)	identification n		U.S.	if related to transferor	Cap	Ť		rofits
				\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	7,					%		%
										%		%
Does the	partne	rship have any other fo	• •						[Yes	X	
Schedul	le A-3	Affiliation Schedu direct interest or in	l le. List al directly ov	l partnerships (wns a 10% inte	(foreign or do rest.	mestic) in w	hich the	foreign	partner	ship	owns a
Name				Address			iN any)	To	tal ordina ome or lo	ii y	Check if foreign artnership	
SEE STA	ATEME	NT 2										
												CE (acce)

Page **3**

	Schedule B Income Statement - Trade or Business Income									
Caution: Include only trade or business income and expenses on lines 1a through 22 below. See the instructions for more information.										
	1a	Gross receipts or sales								
		Less returns and allowances	1c							
Income		Cost of goods sold	2							
	3	Gross profit. Subtract line 2 from line 1c	3							
	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4							
	5	Net farm profit (loss) (attach Schedule F (Form 1040)).	5							
	6	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6							
	7	Other income (loss) (attach statement)	7							
	8	Total income (loss). Combine lines 3 through 7	8							
_	9	Salaries and wages (other than to partners) (less employment credits)	9							
ons	10	Guaranteed payments to partners.	10							
itati	11	Repairs and maintenance	11							
Ë	12	Bad debts.	12							
instructions for limitations)	13	Rent	13							
ctio	14	Taxes and licenses	14							
stru	15	Interest (see instructions)	15							
e.	_	Depreciation (if required, attach Form 4562)								
ees)		Less depreciation reported elsewhere on return	16c							
Su	17	Depletion (Don't deduct oil and gas depletion.)	17							
뜼	18	Retirement plans, etc.	18							
Deductions	19	Employee benefit programs	19							
Ģ	20	Other deductions (attach statement)	20							
_	21	Total deductions. Add the amounts shown in the far right column for lines 9 through 20	21							
	22	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22							
¥	23	Reserved for future use	23							
Jer	24	Reserved for future use	24							
Payment	25	Reserved for future use	25							
	26	Reserved for future use	26							
and	27	Reserved for future use	27							
×	28	Reserved for future use	28							
Тах	29	Reserved for future use	29							
Sc	30 hedu	Reserved for future use	30	Total amount						
συ	1		1	Total amount						
	2		2							
	_	3a Other gross rental income (loss)	_							
		b Expenses from other rental activities (attach statement). 3b								
		c Other net rental income (loss). Subtract line 3b from line 3a	3с							
_	4	Guaranteed payments: a Services 4a b Capital 4b								
Income (Loss)		c Total. Add line 4a and line 4b	4c							
Ę	5		5							
Je	(Dividends and dividend equivalents: a Ordinary dividends	6a							
ĕ		b Qualified dividends 6b								
<u>=</u>		c Dividend equivalents . 6c								
	7	•	7							
	8	1 0 ()()	8							
	٩	Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a							
		b Collectibles (28%) gain (loss) 9b								
	1,0	C Unrecaptured section 1250 gain (attach statement) 9c	40							
	10	5	10							
	11		11(2) 12							
ű	13		13a							
ij	'3	b Investment interest expense	13b							
Deductions			13c(2)							
۵			13d(2)							

2X1913 1 000

- OIIII C	0003 (202	2) CLAITON, DUBILLER	& KICE FUND A,	ШΡ	90-131947	3		raye 🕇
Sch	edule k	Partners' Distributiv	e Share Items (conti	inued)			Total amount	
						14a		
Self- Employ-	b	Gross farming or fishing inco				14b		
တ္မမ	c	Gross nonfarm income						
	15a	Low-income housing credit (15a		
Credits	b	Low-income housing credit (15b		
	C	Qualified rehabilitation expe				15c		
	d	Other rental real estate cred		_ ' '		15d		
ပ်		Other rental credits (see ins	,	Type		15u		
	e f	Other credits (see instruction	•	TypeType		15e		
	-	Other credits (see instruction		131				
International	16	Attach Schedule K-2 (Form 8 check this box to indicate that y						
J	17a	Post-1986 depreciation adju	ıstment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
	С	Depletion (other than oil and				17c		
틸	d	Oil, gas, and geothermal pro	17d					
<u>₽</u> ii 4	е	Oil, gas, and geothermal pro	17e					
2	f	Other AMT items (attach sta	17f					
Other Information	18a	Tax-exempt interest income	18a					
	b	Other tax-exempt income .	18b					
	С	Nondeductible expenses	18c					
Ξ	19 a	Distributions of cash and ma	19a					
٦Ę	b	Distributions of other proper	19b					
Ξ	20 a	Investment income	20a					
ihe	b	Investment expenses	20b					
ō	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	Books. (Not required	d if Item H11, page 1, is	answered "Y	'es.")		
			Beginnin	g of tax year		End	of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash							
2 a	Trade no	otes and accounts receivable.						
b	Less allo	owance for bad debts						
3	Inventori	ies						
4	U.S. Go	vernment obligations						
		npt securities						
6	Other cu	irrent assets (attach statement)						
		p partners (or persons related to						
b	Mortgag	e and real estate loans						
8	Other in	vestments (attach statement)						
9 a	Building	s and other depreciable assets						
b	Less acc	cumulated depreciation.						
10 a	Depletab	ole assets						
b	Less acc	cumulated depletion						
11	Land (ne	et of any amortization)						
12 a	Intangibl	le assets (amortizable only) .						
h	1 000 000	numulated amortization	İ	I				

	hedule L Balance Sheets per Bo	ooks. (Not required if I	Item F	111,	page 1, is answ	ered "Yes.		age C
		Beginning of					End of tax year	
		(a)		(b)		(c)	(d)	
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							
19 a	Loans from partners (or persons related to partners)							
	Mortgages, notes, bonds payable in 1 year or more							—
20	Other liabilities (attach statement)							—
21	Partners' capital accounts							—
22	Total liabilities and capital hedule M Balance Sheets for I	storoot Allogotion						
SC	Balance Sheets for it	iterest Anocation			(-)		(1)	
					(a) Beginnin	a of	(b) End of	
					tax yea	-	tax year	
4	Total II C. acceta			-	14		ian year	
1	Total U.S. assets			• •				
	Total foreign assets: Passive category			- 1				
	General category							
	Other (attach statement)							
	hedule M-1 Reconciliation of Inc				Income (Loss	per Retu	u rn. (Not required if I	ten
	H11, page 1, is answe				(, po	(
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	,	6	l		alsa thia tay		
1	Net income (loss) per books		-		ne recorded on bo not included on			
2	Income included on Schedule K,			•	1 through 11 (itemi			
_	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,				exempt interest \$			
	and 11, not recorded on books		а	ı ax-c	exempt interest \$			
	this tax year (itemize):							
	\$		7	Dodu	ctions included o	n Schodulo		
3	Guaranteed payments (other				es 1 through 13d,			
•	than health insurance)				es i tillough 13d, jed against book			
4	Expenses recorded on books				ear (itemize):	moonic tins		
•	this tax year not included on			,	eciation \$			
	Schedule K, lines 1 through		-	Борі	σοιατίστι ψ			
	13d, and 21 (itemize):							
а	Depreciation \$							
	Travel and entertainment \$		8	Add I	lines 6 and 7			
					ne (loss). Subti			
5	Add lines 1 through 4				line 5			
Scl	hedule M-2 Analysis of Partners'	Capital Accounts. (No	ot req	uire	d if Item H11, p	age 1, is ar	nswered "Yes.")	
1	Balance at beginning of tax year		6	Distri	ibutions: a Cash			
2	Capital contributed:					erty		
	a Cash		7	Othe	r decreases (item	-		_
	b Property							
3	Net income (loss) per books							
4	Other increases (itemize): \$							
			8	Add I	lines 6 and 7			
					nce at end of			
5	Add lines 1 through 4				ract line 8 from li			

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).

	ibabilon that boodings botween ti	10 1010.g., paranoromp ama a	persone meteu m cene	(4) 4.9 (4).	
	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				
	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				
	Distributions received				
7	Interest received				
8	Other				
9	Add lines 1 through 8				
Ť	7 da mios i anough o [[[[[
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
10	Add lines 10 through 18				
	Amounts borrowed (enter the				
_U	maximum loan balance				
	during the tax year). See				
	instructions				
21	Amounts loaned (enter the				
	maximum loan balance				
	during the tax year). See				
	instructions				

SCHEDULE 0 (Form 8865)

(Rev. October 2021)

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

Department of the Treasury Internal Revenue Service				for instructions					
Name of transferor			-		1	Filer's identi	fying number		
CLAYTON, DUBI	LIER & RI	CE FUND X,	LP			58-063	3971		
Name of foreign partners	hip			EIN (if any)		Reference ID number (see instructions)			
CLAYTON, DUBI	LIER & RI	CE FUND X,	LP	98-1319473					
See instruction b If "Yes," was to Was any intal any time ther	ons he gain deferrangible proper eafter, a platf	al method applied ty transferred co	d to avoid the reconsidered or a n as defined in	ned in Regulations cognition of gain uponticipated to be, at Regulations section	on the contrib	oution of p	property?	Yes Yes	X No X No X No
Part I Transfe	rs Reportabl	e Under Section	n 6038B						
Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market va on date of tran		r Recov	(e) ery period	(f) Section 704(c) allocation method	(g) Gain recog on trans	
Cash	12/31/2022		101,9	61.					
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			101,9	161					
			in the partners	hip: (a) Before the trans	sfer	% (b) After the trans	fer	%
Part Disposi	tions Report	able Under Sec	tion 6038B						
(a) Type of	(b) Date of riginal transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Deprecia recaptu recogniz by partner	re ed	(g) Gain allocated to partner	(h) Deprecia recapture al to partr	llocated
2614 2 11	•		-	to gain recognition		•	~ ~	「	
section	904(t)(5)(F)?							Yes 2	<u> No</u>

FORM 8865, PAGE 1 DETAIL

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

NAME LINE 1: MAPLES & CALDER

ADDRESS LINE 1: UGLAND HOUSE, 113 SOUTH CHURCH ST

CITY: GEORGETOWN STATE: GRAND CAYMAN

COUNTRY: CJ FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE

NAME LINE 1: CD&R AG HOLDINGS, LP

375 PARK AVENUE, 18TH FLOOR ADDRESS LINE 1:

NEW YORK

STATE: NY ZIP: 10152

98-1413550 TD:

FOREIGN PARTNERSHIP:

CD&R WOLF HOLDINGS, LP NAME LINE 1:

ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

CITY: NEW YORK

STATE: NYZIP: 10152

98-1524441 TD:

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R HYDRA HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY ZIP: 10152

98-1395909 TD:

FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R PISCES HOLDINGS LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY ZIP: 10152

98-1408846

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R DOCK HOLDINGS, LP

ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY 10152 ZIP:

98-1454328 ID:

FOREIGN PARTNERSHIP: X

FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE (CONT'D)

CD&R LOTUS HOLDINGS, LP 375 PARK AVENUE, 18TH FLOOR NAME LINE 1: ADDRESS LINE 1:

NEW YORK

STATE: NY ZIP: 10152

98-1519941 TD:

FOREIGN PARTNERSHIP:

CD&R MARINER HOLDINGS, LP NAME LINE 1: ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

CITY: NEW YORK

STATE: NYZIP: 10152 98-1486163 TD:

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R PHOENIX HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY ZIP: 10152

98-1511706 TD:

FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R BOSTON HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY ZIP: 10152 98-1513218

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R CHIP HOLDINGS, LP

375 PARK AVENUE, 18TH FLOOR ADDRESS LINE 1:

NEW YORK CITY:

STATE: NY 10152 ZIP:

98-1539713 ID:

FOREIGN PARTNERSHIP: X

FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE (CONT'D)

NAME LINE 1: CD&R SUNSHINE HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK

STATE: NY ZIP: 10152

98-1541620 TD:

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R SMOKEY HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

CITY: NEW YORK

STATE: NYZIP: 10152

98-1541566 TD:

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R MERCURY HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY ZIP: 10152

98-1555663 TD:

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R HUNTER HOLDINGS, LP ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR

NEW YORK CITY:

STATE: NY ZIP: 10152

98-1532358

FOREIGN PARTNERSHIP:

NAME LINE 1: CD&R ARAWAK DL HOLDINGS, LP 375 PARK AVENUE, 18TH FLOOR ADDRESS LINE 1:

NEW YORK CITY:

STATE: NY 10152 ZIP:

37-1975579 ID:

FOREIGN PARTNERSHIP: X

Form **8865**

Department of the Treasury Internal Revenue Service

Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return.

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

beginning 01/01/2022 , and ending 12/31/2022 OMB No. 1545-1668

Attachment Sequence No. 865

Name o	Name of person filing this return						Filer's identification number						
	RT W. WOO			-063397									
Filer's a	iddress (if you are	en't filing this form with	your tax return)			_			ctions and check	applicable box(es	s)):		
				1	2	!	3	X	4				
					tax year begin		01/01	/2022	, and ending	12/31/2	2022		
		abilities: Nonrecourse	•		nonrecourse				Other \$				
		er of a consolidated	group but not th	ie parent, en	iter the follow			bout the par	ent:				
	ame					EIN							
	ddress	epted specified fore	ian financial acco	ote are report	od on this for	m S	oo instruction	nc					
		t certain other partn			eu on this ioi	III. O	ee irisii uciioi	15					
- "	normation abou	t certain other parti	crs (see mandene) is j		Τ			(4) Che	eck applicable bo	x(es)		
(1) Name ((2) Address			(3) Identifica	tion number	Category 1	Category 2	Constructive			
											OWITCH		
G1 N	ame and addre	ss of foreign partners	ship						2(a) EIN (if an	ny)			
									45-2484	4628			
									2(b) Reference	e ID number (see	instructions)		
		ITY PARTNERS	•	LP					•				
		STREET, 7TH	FLOOR						· ·	der whose law	s organized		
	ON,MA 0 ate of	2116 5 Principal place of	of 6 Princip	al business	7 Drie	acina	l bucinose	9a Eupot	ional currency	US nal currency 8b Exchange rate			
	ganization	business		code numbe					USD (see instructio				
01	/01/2021	US	52	3900							000000000		
		ving information for			/ear:					1.000			
1 N	ame, address, a	and identification nu	mber of agent (if	any) in the	2 Ch	eck i	f the foreign	partnership	must file:				
U	nited States				Form 1042 Form 8804 X Form 1065								
					Service Center where Form 1065 is filed:								
					EFILE								
	ame and addres ganization, if ar	ss of foreign partne	rship's agent in co	ountry of	4 Name and address of person(s) with custody of the books and records of the foreign partnership, and the location of such books and records, if different								
Oi	garrization, ii ai	ıy				5 1	1,			,			
	5												
5	-	x year, did the fore section 267A? See			ue any inter	est o	or royalty to	r which the	e deduction is	not Yes	X No		
		the total amount of								163 	21 110		
6		ship a section 721(c		·=·						Yes	X No		
7		cial allocations mad									X No		
8		mber of Forms 885											
		reign Branches (FBs)											
9	How is this pa	rtnership classified	under the law of	the country	in which it's c	rgan	ized?	EXEME	PTED LIMIT	TED PARTN	ERSHIP		
10 a		have an interest in											
		under Regulations s											
		(4)(ii)? If "No," skip o								Yes	X No		
b		the separate unit or											
11		3(d)-1(b)(5)(ii)? nership meet both o								Yes	No		
11	•	nership meet both o	-	•)					
	•	of the partnership's t	•			occ t	han ¢1 millia	, >		Yes	X No		
		complete Schedules			ıax year WaS I	css I	ınan əl millill	". J · ·					
For Pri	•	Paperwork Reduction	·		te instruction	ıs.				Form 8	865 (2022)		

-orm 8865 ((2022)									Page Z			
		of this Form 8865 clain	•	•	`	,	•	,		No			
	nter the amount of gross receipts derived from all sales of general property to the foreign partnership that the filer cluded in its computation of foreign-derived deduction eligible income (FDDEI)												
c En	ter the	amount of gross receipts	derived fror	m all sales of intan	gible property to	the fo	reign partnership th	at the f	iler				
		amount of gross receipts											
		ation of FDDEI							•				
		number of foreign partners rship or of receiving a distr											
		e during the tax year we											
		nts of Regulations section								X No			
Sign Here Only f You're Filing This Form Separately and Not With Your	and I inform	er penalties of perjury, I decla pelief, it is true, correct, and o mation of which preparer has	complete. De	claration of preparer (d	• .				•	wledge			
Tax Return.		ature of general partner or lim	ited liability co	ompany member			Date						
Paid Proparer		Type preparer's name		Preparer's signature			Date Check if PTIN self-employed						
Preparer Use Only	Eirm'o	name							ı				
JUU U,	Firm's	address			1	Phone no.							
		interest you constr	•				constructive interes		Check if foreign	Check if direct			
									person	partner			
Schedu	Iο Δ-1	Certain Partners o	f Foreign	Partnershin (se	ee instruction	s)							
Coneda	IC A-I		i i orolgii	- ,		<u> </u>				Check if			
		Name		Add	ress		Identification nu	umber (if	any)	foreign person			
Schedu	le A-2	Foreign Partners	of Section	n 721(c) Partne	rship (see ins	tructio	ns)						
Name of f	foreign er	Address		Country of organization	U.S. taxpay identification in		Check if related to U.S. transferor		Percentage in	terest Profits			
				(if any)	(if any)			Ca	%	%			
									%	%			
Does the	partne	ship have any other for	eign perso	n as a direct partr	ner?			[Yes	No			
Schedu	le A-3	Affiliation Schedu direct interest or in	le. List a	II partnerships (wns a 10% inte	(foreign or do rest.	mestic	c) in which the f	oreign	partnersh	ip owns a			
		Name		Address			EIN (if any)	Total ordinary income or loss		Check if foreign partnership			

Form 8865 (2022) Page **3**

Sc	hedu	le B Income Statement - Trade or Business Income		
Cau	tion:	Include only trade or business income and expenses on lines 1a through 22 below. See the in	struct	tions for more information.
	1a	Gross receipts or sales1a		
		Less returns and allowances	1c	
	2	Cost of goods sold	2	
e	3	Gross profit. Subtract line 2 from line 1c		
οū	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
Income	_	Net farm profit (loss) (attach Schedule F (Form 1040))	5	
_	5	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
	6 7	Other income (loss) (attach statement)	7	
	8	Total income (loss). Combine lines 3 through 7	8	
	9	Salaries and wages (other than to partners) (less employment credits)	9	
ons)	10	Guaranteed payments to partners.	10	
itati	11	Repairs and maintenance	11	
Ē	12		12	
s fo	13	Bad debts	13	
instructions for limitations)	14	Rent Taxes and licenses	14	
struc	15	Interest (see instructions)	15	
i	-	Depreciation (if required, attach Form 4562)	-10	
ees)		Less depreciation reported elsewhere on return	16c	
us	17	Depletion (Don't deduct oil and gas depletion.)	17	
ţ	18	Retirement plans, etc.	18	
n	19	Employee benefit programs	19	
Deductions	20	Other deductions (attach statement)	20	
	21	Total deductions. Add the amounts shown in the far right column for lines 9 through 20		
_	22	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
_	23	Reserved for future use	23	
ayment	24	Reserved for future use	24	
Ĕ	25	Reserved for future use	25	
Рау	26	Reserved for future use	26	
	27	Reserved for future use	27	
and	28	Reserved for future use	28	
а×	29	Reserved for future use	29	
-	30	Reserved for future use		
Sc	hedu	le K Partners' Distributive Share Items		Total amount
		Ordinary business income (loss) (Schedule B, line 22)	1	
		Net rental real estate income (loss) (attach Form 8825)	2	
	;	3a Other gross rental income (loss)		
		b Expenses from other rental activities (attach statement). 3b		
		c Other net rental income (loss). Subtract line 3b from line 3a	3с	
_	4	Guaranteed payments: a Services 4a b Capital 4b		
SS		c Total. Add line 4a and line 4b	4c	
Income (Loss)		5 Interest income	5	
ě	(6 Dividends and dividend equivalents: a Ordinary dividends	6a	
Ö		b Qualified dividends 6b		
<u>2</u>		c Dividend equivalents . 6c		
	7	7 Royalties		
	1	Net short-term capital gain (loss) (attach Schedule D (Form 1065))		
	9	Pa Net long-term capital gain (loss) (attach Schedule D (Form 1065))	9a	
		b Collectibles (28%) gain (loss) 9b		
		c Unrecaptured section 1250 gain (attach statement) 9c		
	10		10	
	11		11(2)	
ns	12	, , , , , , , , , , , , , , , , , , , ,	12	
ij	13	Ba Contributions	13a	
Deductions		b Investment interest expense	13b	
Sec			13c(2)	
	-1	d Other deductions (see instructions) (1) Type (2) Amount	13d(2)	

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orm 8	865 (202	2) DENHAM COMMODITY I	PARTNERS FUND VI	, ЦР	45-248462	8		Page 4
Sch	edule ł	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
- Ş+	. 14a	Net earnings (loss) from self	-employment			14a		
	b	Gross farming or fishing inco						
Self- Employ-	c	Gross nonfarm income						
	15 a	Low-income housing credit						
	b	Low-income housing credit						
its	c	Qualified rehabilitation expe						
Credits	d	Other rental real estate cred		_		15d		
ū	e	Other rental credits (see ins	•	Type		15e		
	f	Other credits (see instruction	•	Type		15f		
International	16	Attach Schedule K-2 (Form 8 check this box to indicate that y	865), Partners' Distributi	ve Share Items - Interi				
×	17a	Post-1986 depreciation adju	ıstment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
ᇐᆴ	С	Depletion (other than oil and	l gas)			17c		
JEE	d	Oil, gas, and geothermal pro	perties - gross income.			17d		
A Fig	е	Oil, gas, and geothermal pro	operties - deductions			17e		
	f	Other AMT items (attach sta	itement)			17f		
	18 a	Tax-exempt interest income				18a		
Other Information	b	Other tax-exempt income .				18b		
ati	С	Nondeductible expenses		18c				
Ē	19 a	Distributions of cash and ma		19a				
of L	b	Distributions of other proper	ty			19b		
_	20 a	Investment income				20a		
the	b	Investment expenses				20b		
ō	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	Books. (Not required	l if Item H11, page 1	1, is answered "Y	'es.")		
			Beginnin	g of tax year		End	l of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash .							
2 a	Trade no	otes and accounts receivable .						
b	Less allo	owance for bad debts						
3	Inventor	ies						
4	U.S. Go	vernment obligations						
5	Tax-exer	mpt securities						
6	Other cu	ırrent assets (attach statement)						
		partners (or persons related to						
	partners)						
		e and real estate loans						
		vestments (attach statement)						
	U	s and other depreciable assets						
		cumulated depreciation.						
		ole assets						
		cumulated depletion						
		et of any amortization)						
		le assets (amortizable only)						
<u>b</u>	Less acc	cumulated amortization						

	dule L Balance Sheets per E			page 1, is answered "Yes	, , , , , , , , , , , , , , , , , , , ,
			ng of tax year		End of tax year
		(a)	(b)	(c)	(d)
3 (Other assets (attach statement)				
4 т	otal assets Liabilities and Capital				
5 A	Accounts payable				
6 M	fortgages, notes, bonds payable in less than 1 year				
7	Other current liabilities (attach statement)				
	All nonrecourse loans				
9 a ∟	oans from partners (or persons related to partners)				
	fortgages, notes, bonds payable in 1 year or more				
	Other liabilities (attach statement)				
	Partners' capital accounts otal liabilities and capital				
	edule M Balance Sheets for	Interest Allocation			
30116	Balance Checke for	mitor oot 7 moodation		(a)	(b)
				Beginning of	End of
				tax year	tax year
1 1	otal U.S. assets.				
	otal foreign assets:				
a F	Passive category				
b (General category				
	Other (attach statement)				
Sche	edule M-1 Reconciliation of Ir		Books With	Income (Loss) per Reti	urn. (Not required if Ite
	H11, page 1, is answ	vered "Yes.")			
			6 Incor	ne recorded on books this tax	
	Net income (loss) per books		year	not included on Schedule K,	
2 l	ncome included on Schedule K,		year lines	not included on Schedule K, 1 through 11 (itemize):	
2 li	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		year lines	not included on Schedule K,	
2 li	ncome included on Schedule K, ines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books		year lines	not included on Schedule K, 1 through 11 (itemize):	
2 li li a t	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize):		year lines a Tax-	not included on Schedule K, 1 through 11 (itemize): exempt interest \$	
2 li a t	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize):		year lines a Tax-	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other		year lines a Tax- 7 Dedu K, lin	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not	
2	ncome included on Schedule K, ines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance)		year lines a Tax- 7 Dedu K, lin charç	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not led against book income this	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books		year lines a Tax- 7 Dedu K, lin charg	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not	
2	ncome included on Schedule K, ines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance)		year lines a Tax- 7 Dedu K, lin charg	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize):	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on		year lines a Tax- 7 Dedu K, lin charg	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize):	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through		year lines a Tax- 7 Dedu K, lin charg	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize):	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize):		year lines a Tax- 7 Dedu K, lin charg tax year a Depi	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize):	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$		year lines a Tax- 7 Dedu K, lin charç tax ye a Depu 8 Add 9 Incom	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$		year lines a Tax- 7 Dedu K, lin charg tax year a Depri ————————————————————————————————————	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5	
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$	s' Capital Accounts.	year lines a Tax- 7 Dedu K, lin charg tax ye a Depu 8 Add 9 Income from (Not require	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is all	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$	s' Capital Accounts.	year lines a Tax- 7 Dedu K, lin charg tax ye a Depu 8 Add 9 Income from (Not require	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is all ibutions: a Cash	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$	s' Capital Accounts.	year lines a Tax- 7 Dedu K, lin charq tax year a Depri 8 Add 9 Inconfrom (Not require 6 Distr	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is an ibutions: a Cash b Property	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$		year lines a Tax- 7 Dedu K, lin charq tax year a Depri 8 Add 9 Inconfrom (Not require 6 Distr	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is all ibutions: a Cash	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$	s' Capital Accounts.	year lines a Tax- 7 Dedu K, lin charq tax year a Depri 8 Add 9 Inconfrom (Not require 6 Distr	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is an ibutions: a Cash b Property	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Perceiation \$		year lines a Tax- 7 Dedu K, lin charq tax year a Depri 8 Add 9 Inconfrom (Not require 6 Distr	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is an ibutions: a Cash b Property	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Depreciation \$		year lines a Tax- 7 Dedu K, lin charg tax ye a Depu 8 Add 9 Income from (Not require 6 Distr 7 Othe	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is all ibutions: a Cash b Property or decreases (itemize): \$ ar decreases (itemize): \$	nswered "Yes.")
2	ncome included on Schedule K, nes 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books his tax year (itemize): Guaranteed payments (other han health insurance) Expenses recorded on books his tax year not included on Schedule K, lines 1 through 3d, and 21 (itemize): Perceiation \$		year lines a Tax- 7 Dedu K, lin charg tax ye a Depu 8 Add 9 Incomprose from (Not require 7 Othe 8 Add 8 Add 9 Incomprose from 7 Othe 8 Add 8 Add 9 Incomprose from 7 Othe 8 Add 8 Add 8 Add	not included on Schedule K, 1 through 11 (itemize): exempt interest \$ ctions included on Schedule es 1 through 13d, and 21, not ged against book income this ear (itemize): reciation \$ lines 6 and 7 me (loss). Subtract line 8 line 5 d if Item H11, page 1, is an ibutions: a Cash b Property	nswered "Yes.")

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).

		<u> </u>	<u>'</u>	() 3 ()	
	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				
	Sales of property rights (patents,				
3	trademarks, etc.) 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				
	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance during the tax year). See				
	instructions				
					F 0065 (0000)

SCHEDULE 0 (Form 8865)

(Rev. October 2021)

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

Department of the Treasury Internal Revenue Service					ne instructions t structions and t					
Name of transferor							Filer's ident	ifying number		
DENHAM COMMOD	ITY PARTN	IERS FUND V	/I, LP				58-063	3971		
Name of foreign partners				EIN (if	any)		Reference I	D number (see in:	structions)	
DENHAM COMMOD	ITY PARTN	ERS FUND V	/I, LP	45-	2484628					
1a Is the partne See instruction	ons								Yes	X No
	-			-	tion of gain upo				Yes	X No
					ated to be, at t lations section				Voo	TY No
		le Under Secti		ii ixegi	nations section	1.402-7(0	<u>/// </u>		Yes	X No
Tarre	I				(4)		(2)	(6)	Т	(m)
Type of property	(a) Date of transfer	(b) Description of property	Fair market on date of tra		(d) Cost or other basis	Rec	(e) overy period	(f) Section 704(c) allocation methor		(g) recognized transfer
Cash	12/31/2022		219	,209.						
Stock, notes										
receivable and										
payable, and other securities										
									+	
Inventory									1	
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										
T-4-I-										
Totals 3 Enter the tran	eferor's per	entage interes		, 209 . ship: (a	 ı) Before the trans	for	0/_ /	b) After the tran	efor	%
Supplemental Infor						5161	70 (D) Aitel the train	3101	
			(
Part Disposi	tions Report	able Under Se	ction 6038B							
(a)	(b)	(c)	(d)		(e)	(f) Depred		(g)	Der	(h) preciation
Type of property o	Date of riginal transfer	Date of disposition	Manner of disposition		Gain recognized by partnership	recap recogr		Gain allocated to partner	recapti	ure allocated
		' "	1			by partn	ership		+ to	partner
									+	
									+	
									1	
ls anv t	ransfer repoi	ted on this so	hedule subiec	t to as	nin recognition	under se	ction 904	f)(3) or		
126:14 HILL	•		-	•			•		Yes	X No
For Paperwork Redu					<u></u>					8865) 10-2021

Form **8865**

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

Attachment

OMB No. 1545-1668

Department of the Treasury

beginning , and ending Sequence No. 865 Internal Revenue Service 01/01/2022 12/31/2022 Filer's identification number Name of person filing this return 58-0633971 ROBERT W. WOODRUFF ARTS CENTER, INC 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)): Х 06/01/2022 05/31/2023 B Filer's tax year beginning and ending Filer's share of liabilities: Nonrecourse \$ Other \$ Qualified nonrecourse financing \$ D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name Address Check if any excepted specified foreign financial assets are reported on this form. See instructions Information about certain other partners (see instructions) (4) Check applicable box(es) (1) Name (2) Address (3) Identification number Constructive Category 1 Category 2 G1 Name and address of foreign partnership 2(a) EIN (if any) 98-1350432 2(b) Reference ID number (see instructions) DIGITAL ALPHA FUND A, LP 3 Country under whose laws organized 3535 EXECUTIVE TERMINAL DRIVE STE 110 HENDERSON, NV 89052 CJ 7 Principal business 4 Date of 5 Principal place of 6 Principal business 8a Functional currency 8b Exchange rate organization business activity code number (see instructions) activity TNVESTING USD 523900 06/05/2017 CJ 1.000000000000 Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the 2 Check if the foreign partnership must file: **United States** Form 1042 Form 8804 X Form 1065 Service Center where Form 1065 is filed: EFILE 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 foreign partnership, and the location of such books and records, if different organization, if any STMT 1 MAPLES CORPORATE SERVICES LIMITED During the tax year, did the foreign partnership pay or accrue any interest or royalty for which the deduction is not allowed under section 267A? See instructions X No Yes If "Yes," enter the total amount of the disallowed deductions 6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? Χ No Yes Were any special allocations made by the foreign partnership? Χ 7 No Enter the number of Forms 8858, Information Return of U.S. Persons With Respect to Foreign Disregarded Entities (FDEs) and Foreign Branches (FBs), attached to this return. See instructions 9 How is this partnership classified under the law of the country in which it's organized? EXEMPTED LIMITED PARTNERSHIP 10 a Does the filer have an interest in the foreign partnership, or an interest indirectly through the foreign partnership, that's a separate unit under Regulations section 1.1503(d)-1(b)(4) or part of a combined separate unit under Regulations section 1.1503(d)-1(b)(4)(ii)? If "No," skip question 10b X No If "Yes," does the separate unit or combined separate unit have a dual consolidated loss, as defined in Regulations section 1.1503(d)-1(b)(5)(ii)? Does this partnership meet both of the following requirements? 11 1. The partnership's total receipts for the tax year were less than \$250,000. X 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.

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

Form 8865 (2022) Page **2**

011111 00	-) 00	<u></u> ,									r age 🗕		
12 a			of this Form 8865 clain on transaction with the fo	Ū	•	,	,	,	,		No No		
b			amount of gross receipts its computation of foreigr		•			•					
С			amount of gross receipts its computation of FDDEI							e filer			
d			amount of gross receipts of ation of FDDEI						er includ	led in			
13	Ente	r the r	number of foreign partners rship or of receiving a distr	subject to	section 864(c)(8) as	s a result of trans	sferring	all or a portion of					
14	At a	any tim	e during the tax year we	re any trar	nsfers between the	partnership and	its par	tners subject to t	he discl	osure	X No		
Sign Here You're F This Form Separatel	iling y and	and I	er penalties of perjury, I decla pelief, it is true, correct, and o mation of which preparer has	complete. De	eclaration of preparer (d					•	•		
ax Retur	n.	Sign	ature of general partner or lim	ited liability c	company member			Date					
Paid		Print/	Type preparer's name		Preparer's signatu	ıre		Date	Check self-en	if PTIN			
	reparer									Firm's EIN			
Jse U	niy †	Firm's	address						Phone	no.			
			box b , enter the na interest you constr	uctively o	own. See instruc	tions.	Owns a	constructive inter	est	Check if foreign	Check if direct		
										person	partner		
Sche	dule	2 A-1	Certain Partners o	f Foreiar	n Partnership (se	ee instruction	s)						
			Name		Add		,	Identification	number	(if any)	Check if foreign person		
Sche	dule	Δ-2	Foreign Partners	of Section	on 721(c) Partne	rshin (see ins	structio	ns)					
					Country of	U.S. taxpa		Check if related	to	Percentage in	nterest		
Name pa	artner		Address		organizátion (if any)	identification n (if any)		U.S. transferor		Capital	Profits		
					(=)	(,)				%	%		
										%	%		
Does t	he p	artne	ship have any other for	eign perso	on as a direct partr	ner?				Yes	No		
Sche				le. List a	all partnerships (foreign or do	mestic	c) in which the	e forei				
			Name		Address			EIN (if any)		Total ordinary income or loss	Check if foreign partnership		
SEE :	STA	TEME	NT 2										

Form 8865 (2022) Page **3**

		le B Income Statement - Trade or Business Income		
Cau	tion:	Include only trade or business income and expenses on lines 1a through 22 below. See the in	structi	ons for more information.
	1a	Gross receipts or sales		
		Less returns and allowances. 1b	1c	
	2	Cost of goods sold	2	
e	3	Gross profit. Subtract line 2 from line 1c	3	
Income	4	Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
nc	5	Net farm profit (loss) (attach Schedule F (Form 1040)).	5	
_	6	Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
	7	Other income (loss) (attach statement)	7	
	8	Total income (loss). Combine lines 3 through 7	8	
	9	Salaries and wages (other than to partners) (less employment credits)	9	
for limitations)	-		10	
itatic	10 11	Guaranteed payments to partners	11	
<u>=</u>		Repairs and maintenance	12	
s for	12	Bad debts	13	
instructions	13	Rent	14	
truc	14	Taxes and licenses	15	
ins	15	Interest (see instructions)	13	
ees)		Depreciation (if required, attach Form 4562)	16c	
Š		Less depreciation reported elsewhere on return	17	
<u>ō</u>	17	Depletion (Don't deduct oil and gas depletion.)		
걸	18	Retirement plans, etc.	18	
Deductions	19	Employee benefit programs	19	
Ŏ	20	Other deductions (attach statement)	20	
_	21	Total deductions. Add the amounts shown in the far right column for lines 9 through 20	21	
	22	Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
Ħ	23	Reserved for future use	23	
Payment	24	Reserved for future use	24	
a Z	25	Reserved for future use	25	
	26	Reserved for future use	26	
and	27	Reserved for future use	27	
	28	Reserved for future use	28	
Тах	29	Reserved for future use	29	
0.0	30	Reserved for future use	30	Total amount
S C		le K Partners' Distributive Share Items		Total amount
		1 Ordinary business income (loss) (Schedule B, line 22)	1	
		Net rental real estate income (loss) (attach Form 8825)	2	
	;	3a Other gross rental income (loss)		
		b Expenses from other rental activities (attach statement). 3b	-	
		c Other net rental income (loss). Subtract line 3b from line 3a	3с	
ŝ	1	4 Guaranteed paymenteed a Services 4a b Capital 4b		
OS	١.	c Total. Add line 4a and line 4b	4c	
Income (Loss)		5 Interest income	5	
Ë	'	6 Dividends and dividend equivalents: a Ordinary dividends	6a	
S		b Qualified dividends 6b	-	
⊆	١.	c Dividend equivalents . 6c	- 1	
		7 Royalties	7	
		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) 9b		
		c Unrecaptured section 1250 gain (attach statement) 9c	4.0	
	10		10	
	11		11(2)	
Suc	12	,	12	
ίż	13	3a Contributions	13a	
Deductions		b Investment interest expense	13b	
Ģ			13c(2)	
_	1	d Other deductions (see instructions) (1) Type (2) Amount	13d(2)	

2X1913 1.000

Form 8	865 (202	2) DIGITAL ALPHA FUNI	A, LP		98-135043	2		Page 4
Sch	edule k	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
. \$.	. 14a	Net earnings (loss) from self				14a		
등음	b	Gross farming or fishing inco						
Self- Employ-	С	Gross nonfarm income						
	15 a	Low-income housing credit (
"	b	Low-income housing credit (
뜵	С	Qualified rehabilitation expe						
Credits	d	Other rental real estate cred		15d				
S	е	Other rental credits (see ins	tructions)	Type Type		15e		
	f	Other credits (see instruction	ns)	Type		15f		
International	16	Attach Schedule K-2 (Form 8) check this box to indicate that y						
	17a	Post-1986 depreciation adju	ıstment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss						
돌도	С	Depletion (other than oil and						
필드	d	Oil, gas, and geothermal pro	perties - gross income.			17d		
돌필존	е	Oil, gas, and geothermal pro	operties - deductions			17e		
2	f	Other AMT items (attach sta	itement)			17f		
	18 a	Tax-exempt interest income						
o	b	Other tax-exempt income .		18b				
Other Information	С	Nondeductible expenses	18c					
Ē	19 a	Distributions of cash and ma	19a					
nfo	b	Distributions of other proper	19b					
	20 a	Investment income		20a				
the	b	Investment expenses				20b		
ō	С	Other items and amounts (a	ittach statement)					
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	Books. (Not required	l if Item H11, page 1, is	answered "Y			
			Beginnin	g of tax year		End	of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash .							
2 a	Trade no	otes and accounts receivable.						
b	Less allo	owance for bad debts						
3	Inventor	ies						
		vernment obligations						
		mpt securities						
		ırrent assets (attach statement)						
		partners (or persons related to						
)						
		e and real estate loans						
		vestments (attach statement)						
	-	s and other depreciable assets						
		cumulated depreciation.						
		ole assets						
		cumulated depletion						
		et of any amortization)						
		le assets (amortizable only)			-			
<u> </u>	Less acc	cumulated amortization	<u> </u>		I			

Form	8865 (2022)					Page 5
Scl	hedule L Balance Sheets per Boo				page 1, is answered "Yes.	.") (continued)
		Beginning	of tax y	ear	E	End of tax year
		(a)		(b)	(c)	(d)
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					
19 a	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					
Scl	hedule M Balance Sheets for Inte	erest Allocation				
					(a)	(b)
					Beginning of	End of
					tax year	tax year
1	Total U.S. assets					
2	Total foreign assets:			ļ		
	Passive category					
b	General category					
	Other (attach statement)					
Sc	hedule M-1 Reconciliation of Inco		ooks	With	Income (Loss) per Retu	urn. (Not required if Item
	H11, page 1, is answere	ed "Yes.")				
			6	Incom	ne recorded on books this tax	
1	Net income (loss) per books			year	not included on Schedule K,	
2	Income included on Schedule K,			lines '	1 through 11 (itemize):	
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,		а	Tax-e	exempt interest \$	
	and 11, not recorded on books					
	this tax year (itemize):					
	\$		_ 7	Dedu	ctions included on Schedule	
3	Guaranteed payments (other			K, line	es 1 through 13d, and 21, not	
	than health insurance)				jed against book income this	
4	Expenses recorded on books				ear (itemize):	
	this tax year not included on		а		eciation \$	
	Schedule K, lines 1 through				,	
	13d, and 21 (itemize):					
а	Depreciation \$					
	Travel and entertainment \$		8	Add I	lines 6 and 7	
			9		me (loss). Subtract line 8	
5	Add lines 1 through 4			from	line 5	
Sc	hedule M-2 Analysis of Partners' C	apital Accounts. (Not re	quire	d if Item H11, page 1, is ar	nswered "Yes.")
1	Balance at beginning of tax year		6	Distri	ibutions: a Cash	
2	Capital contributed:				b Property	
-	a Cash • • • • •		7	Othe	r decreases (itemize): \$	
	b Property		7	J 11.10		
3	Net income (loss) per books					
4	Other increases (itemize): \$					
-	στισι ποιοσσοσ (ποιπέο). ψ		8		lines 6 and 7	
			9		nce at end of tax year.	
5	Add lines 1 through 4				ract 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).

		<u> </u>	<u>'</u>	() 3 ()	
	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				
	Sales of property rights (patents,				
3	trademarks, etc.) 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				
	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
19	Add lines 10 through 18				
20	Amounts borrowed (enter the				
	maximum loan balance				
	during the tax year). See				
21	instructions				
	maximum loan balance during the tax year). See				
	instructions				
					F 0065 (0000)

SCHEDULE O (Form 8865)

Department of the Treasury

(Rev. October 2021)

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				Filer's ident	ifying number		
DIGITAL ALPH	HA FUND A,	LP					58-063	3971		
Name of foreign partne	ership			EIN (if any	')		Reference I	D number (see	instructions	5)
DIGITAL ALPH				98-13						
1a Is the partr		on 721(c) par	tnership (as de	efined in I	Regulations s	section 1.	.721(c)-1T(b)(14))?		
	tions								Yes	X No
	the gain deferr			_					Yes	X No
2 Was any in	tangible prope ereafter, a platf	rty transferred form contributi	considered or on as defined i	anticipate in Regulat	ed to be, at the	ne time o 1 482-7(c	i the trans	ier or at	Yes	X No
	fers Reportab			Trogula		1.402 7(0	/// / / · · · ·		163	_ A NO
	(a)	(b)	(c)		(d)		(e)	(f)		(g)
Type of property	Date of transfer	Description of property			Cost or other basis	Rec	overy period	Section 704 allocation me	` '	recognized r transfer
Cash	12/31/2022		185	,561.						
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	e									
in section 197(f)(9)										
Other										
property										
Totals			185	,561.						
3 Enter the tr	ansferor's per	centage intere	st in the partne	rship: (a) B	efore the trans	fer 2	.530 % (b) After the t	ransfer	1.981%
Supplemental Inf	ormation Requ	uired To Be Re	eported (see in	nstructions	s):					
D (II D)										
Part Dispo	sitions Report	able Under Se	ection 6038B			(f)				/b)
(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition		(e) recognized partnership	Depred recap recogr	iation ture nized	(g) Gain allocated to partner	recap	(h) preciation ture allocated
•						by partn	ersnip		100	partner
ls an	/ transfer repo	rted on this so	chedule subjec	t to gain	recognition	under se	ction 904/	f)(3) or		
- 14 - III	n 904(f)(5)(F)?		•	•	•		•	· · · · _	Yes	X No
For Paperwork Rec									_	8865) 10-2021

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

NAME LINE 1: MAPLES CORPORATE SERVICES LIMITED

ADDRESS LINE 1: PO BOX 309, UGLAND HOUSE

CITY: GRAND CAYMAN STATE: CAYMAN ISLANDS

COUNTRY: CJ

POSTAL CODE: HY1-1104

SCHEDULE A-3 - AFFILIATION SCHEDULE

NAME LINE 1: DA CLOUD HOLDINGS, LLC

ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110

HENDERSON

STATE: NV ZIP: 89052

98-1414746 TD:

FOREIGN PARTNERSHIP:

CITIES DIGITAL INFRASTRUCTURE, LLC 3535 EXECUTIVE TERMIAL DR, STE 110 NAME LINE 1: ADDRESS LINE 1:

CITY: HENDERSON

STATE: NV 89052 ZIP:

ID: 84-3722404

NAME LINE 1: CONNECTED FUTURE, LLC

ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110

CITY: HENDERSON

STATE: NV 89052 ZIP:

ID: 84-1789181

DA SAFETY SOLUTIONS I, LP

NAME LINE 1: ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110

CITY: HENDERSON

STATE: NV ZIP: 89052

98-1589850

FOREIGN PARTNERSHIP: X

NAME LINE 1: DIGITAL ALPHA SOLUTIONS FUND, LP 3535 EXECUTIVE TERMIAL DR, STE 110 ADDRESS LINE 1:

HENDERSON CITY:

STATE: NVZIP: 89052

98-1681558

FOREIGN PARTNERSHIP:

Form **8865**

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 01/01/2022 , and ending

Attachment 12/31/2022

OMB No. 1545-1668

Department of the Treasury Internal Revenue Service

nternal Revenue Service	beginnir	01/0	1/2022	, and endin	g <u>1</u> 2/3	1/2022		Sequence N	lo. 865
Name of person filing this	s return			F	iler's identific	ation numb	er		
ROBERT W. WOO	DRUFF ARTS CENT	ER, INC.		5	8-063397	1			
Filer's address (if you are	en't filing this form with your	tax return)	A Category	of filer (see Ca	tegories of Filers	in the instru	ctions and check	applicable box(e	s)):
			1	2	3	X	4		
			B Filer's tax	year beginning	01/01	/2022	, and ending	12/31/	2022
C Filer's share of li	abilities: Nonrecourse \$		Qualified no	nrecourse fi	nancing \$		Other \$		
D If filer is a memb	per of a consolidated gro	up but not the	parent, enter	the following	g information a	bout the par	ent:		
Name				E	IN				
Address									
	epted specified foreign f			on this form.	See instruction	ıs			
F Information abou	ıt certain other partners (see instruction	s)						
(1) Na	ame	(2) Address		(3) Identifica	tion number		eck applicable bo	constructive
							Category 1	Category 2	owner
G1 Name and addre	ss of foreign partnership						2(a) EIN (if a	nv)	
OT Name and addre	33 of foreign partifership						98-161		
								e ID number (see	e instructions)
DRAGONEER OPP	ORTUNITIES FUND) WT T.D					(0, 11111111111111111111111111111111111	(,
	RIVE, BLDG D, S	*					3 Country un	der whose law	s organized
SAN FRANCISCO		711 11500					CJ		Ü
4 Date of	5 Principal place of	6 Principal			pal business	8a Funct	ional currency	8b Exchang	
organization	business	activity c	ode number	activit INVES	Y TMENTS	τ	JSD	(see ins	tructions)
08/10/2021	CJ	523	900					1.00	0000000000
H Provide the follow	wing information for the	foreign partner	ship's tax yea	r:		<u>'</u>			
	and identification numbe	r of agent (if ar	ny) in the	2 Check	if the foreign	partnership	must file:		
United States					Form 1042	For	m 8804	X Form 106	5
				Servic	e Center where	Form 1065 is	filed:		
				EFI	LE				
	ss of foreign partnership	's agent in cou	ntry of	4 Name	and address of	person(s) with	n custody of the b n of such books a	ooks and records	of the
organization, if a	пу			STMT	Partificiship, ai	ia tire location	i oi suon books a	na records, ii diik	SIGH
				PAT ROB	ERTSON				
	x year, did the foreign						e deduction is		
allowed under	section 267A? See instr	uctions						Yes	X No
	r the total amount of the								37 11
	ship a section 721(c) pa		-						
	ecial allocations made by								X No
	mber of Forms 8858, In preign Branches (FBs), atta								
	artnership classified und								
	have an interest in the funder Regulations section								
)(4)(ii)? If "No," skip ques								X No
	the separate unit or cor								
	3(d)-1(b)(5)(ii)?	•					-	Yes	No
	tnership meet both of the					```			
•	rship's total receipts for			\$250,000.					
•	of the partnership's total	•			s than \$1 millio	n. >		Yes	X No
	complete Schedules L, N								
Ear Brivagy Act and I	Panerwork Reduction A	ot Notice, see	the congrete i	netructions				Form \$	3865 (2022)

01111 000	0 (2022	•)										i age =
		filer of this Form 8865 clain to any transaction with the fo		•	` '		`		,		es	No
		ne amount of gross receipts d in its computation of foreigr		•			• .	•				
С	Enter th	nter the amount of gross receipts derived from all sales of intangible property to the foreign partnership the										
d										in		
13	Enter the number of foreign partners subject to section 864(c)(8) as a result of transferring all or a portion of an int the partnership or of receiving a distribution from the partnership At any time during the tax year were any transfers between the partnership and its partners subject to the dis											
İ	require	ments of Regulations section	1.707-8?							Y	es :	X No
Sign Here (f You're Fil This Form Separately	ing a ir	nder penalties of perjury, I decla nd belief, it is true, correct, and o formation of which preparer has	complete. Decla								-	e
Not With Y Fax Return		ignature of general partner or lim	ited liability com	pany member			Date	Date				
Paid Prepar		int/Type preparer's name		Preparer's signatu	eparer's signature			Date Check if PTIN self-employed				
Use Oı	nly Fir	Firm's name							irm's EIN			
Sched		m's address Constructive Own							hone no.			
		box b , enter the na interest you constr	uctively ow	n. See instruc	tions.	Owns a	construc	tive interest		Check i	f Ch	eck if
		Name		Add	ress	Iu	enuncau	on number (п апу)	foreign person		irect artner
Sched	dule A	-1 Certain Partners o	f Foreign P	Partnership (se	ee instructions	s)						
		Name		Add	ress		Iden	tification nu	mber (if	any)	for	eck if reign erson
											+	
Sched	lule A	-2 Foreign Partners	of Section				ns)					
Name o	of foreig rtner	ign Address		Country of organization (if any)	U.S. taxpay identification n (if any)	er umber		f related to ransferor	P Car	ercentage oital	e interest Prof	
									%			%
Does th	ne nart	 nership have any other for	eign person	as a direct partr					Γ	% Yes		No
Sched			le. List all	partnerships (foreign or do	mestic) in wh	ich the fo	oreign		ship o	
		Name		Address			EIN (if any)			Total ordinary income or loss		eck if reign nership
SEE S	TATE	MENT 2					-				Parti	ioromp
											. 2265	(2022

Form 8865 (2022) Page **3**

Sc	hedul	e B Income Statement - Trade or Business Income		
Cau	tion: l	nclude only trade or business income and expenses on lines 1a through 22 below. See the in	struct	tions for more information.
	1a	Gross receipts or sales1a		
		Less returns and allowances.	1c	
		Cost of goods sold	2	
e	3	Gross profit. Subtract line 2 from line 1c		
Income		Ordinary income (loss) from other partnerships, estates, and trusts (attach statement)	4	
၁		Net farm profit (loss) (attach Schedule F (Form 1040)).	5	
_		Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797).	6	
		Other income (loss) (attach statement)	7	
		Total income (loss). Combine lines 3 through 7	8	
		Salaries and wages (other than to partners) (less employment credits)	9	
ons)		Guaranteed payments to partners	10	
itati		Repairs and maintenance	11	
Ē			12	
s fo		Bad debts	13	
instructions for limitations)		Rent Taxes and licenses	14	
struc		Interest (see instructions)	15	
i		Depreciation (if required, attach Form 4562)	-10	
ees)		Less depreciation reported elsewhere on return	16c	
us		Depletion (Don't deduct oil and gas depletion.)	17	
ţ		Retirement plans, etc.	18	
n		Employee benefit programs	19	
Deductions		Other deductions (attach statement)	20	
		Total deductions. Add the amounts shown in the far right column for lines 9 through 20		
_		Ordinary business income (loss) from trade or business activities. Subtract line 21 from line 8	22	
_		Reserved for future use	23	
ayment		Reserved for future use	24	
Ĕ		Reserved for future use	25	
Рау		Reserved for future use	26	
		Reserved for future use	27	
and		Reserved for future use	28	
а×		Reserved for future use	29	
-		Reserved for future use		
Sc	hedul			Total amount
	1		1	
	2		2	
	3	a Other gross rental income (loss)		
		b Expenses from other rental activities (attach statement). 3b		
		c Other net rental income (loss). Subtract line 3b from line 3a	3с	
_	4	Guaranteed payments: a Services 4a b Capital 4b		
SS		c Total. Add line 4a and line 4b	4c	
Income (Loss)	5	Interest income	5	
ě	6	Dividends and dividend equivalents: a Ordinary dividends	6a	
Ö		b Qualified dividends 6b		
<u>2</u>		c Dividend equivalents . 6c		
	7	·		
	8	1 5 () () ()		
	9		9a	
		b Collectibles (28%) gain (loss) 9b		
		c Unrecaptured section 1250 gain (attach statement) 9c		
	10	, , , ,	10	
	11	Other income (loss) (see instructions) (1) Type (2) Amount	11(2)	
ns	12	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	12	
ij	13		13a	
Deductions		b Investment interest expense	13b	
ပ္			13c(2)	
ě		d Other deductions (see instructions) (1) Type (2) Amount	13d(2)	ı

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-orm &	865 (202	2) DRAGONEER OPPORTUI	NITIES FUND VI,	ГЬ	98-161862	/		Page 4
Sch	edule ł	Partners' Distributiv	e Share Items (conti	nued)			Total amount	
- Ş+	. 14a	Net earnings (loss) from self		14a				
Self- Employ-	b	Gross farming or fishing inco						
တ္ထမ္	c	Gross nonfarm income						
	15 a	Low-income housing credit						
	b	Low-income housing credit						
its	c	Qualified rehabilitation expe						
Credits	d	Other rental real estate cred		_	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	15d		
ū	e	Other rental credits (see ins	•	Type		15e		
	f	Other credits (see instruction	•	Type		15f		
International	16	Attach Schedule K-2 (Form 8 check this box to indicate that y	101					
×	17a	Post-1986 depreciation adju	ustment			17a		
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss				17b		
ᇐᆴ	С	Depletion (other than oil and	l gas)			17c		
JEE	d	Oil, gas, and geothermal pro	17d					
A Fig	е	Oil, gas, and geothermal pro	17e					
	f	Other AMT items (attach sta	17f					
	18 a	Tax-exempt interest income		18a				
Other Information	b	Other tax-exempt income .	18b					
ati	С	Nondeductible expenses				18c		
Ē	19 a	Distributions of cash and ma	19a					
of L	b	Distributions of other proper	ty			19b		
_	20 a	Investment income				20a		
the	b	Investment expenses				20b		
ō	С	Other items and amounts (a						
	21	Total foreign taxes paid or a	ccrued			21		
Sch	edule L	Balance Sheets per E	Books. (Not required	l if Item H11, page 1	, is answered "Y	'es.")		
			Beginnin	g of tax year		End	l of tax year	
		Assets	(a)	(b)	(c)		(d)	
1	Cash .							
2 a	Trade no	otes and accounts receivable .						
b	Less allo	owance for bad debts						
3	Inventor	ies						
4	U.S. Go	vernment obligations						
5	Tax-exer	mpt securities						
6	Other cu	urrent assets (attach statement)						
		partners (or persons related to						
	partners)						
		e and real estate loans						
		vestments (attach statement)						
	U	s and other depreciable assets						
		cumulated depreciation.						
		ole assets						
		cumulated depletion						
		et of any amortization)						
		le assets (amortizable only)						
IJ	Less acc	cumulated amortization	<u> </u>					

_

	8865 (2022)	ooko (Not roquirod if Ita	.m ⊔11	naga 1 is answered "Voc	"\ (continued)
SC	nedule L Balance Sheets per B	Beginning of ta		, page 1, is answered "Yes E	.) (<i>COntinued)</i> End of tax year
		(a)	, (k		(d)
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)				
8	All nonrecourse loans				
9 a	Loans from partners (or persons related to partners)				
	Mortgages, notes, bonds payable in 1 year or more				
20	Other liabilities (attach statement)				
21	Partners' capital accounts				
22 Sal	Total liabilities and capital nedule M Balance Sheets for I	ntorest Allegation			
SU	balance Sheets for i	niterest Anocation		(5)	(1-)
				(a) Beginning of	(b) End of
				tax year	tax year
1	Total U.S. assets			,	,
2	Total foreign assets:				
_	Passive category				
	General category				
	Other (attach statement)				
	nedule M-1 Reconciliation of Inc				urn. (Not required if Ite
	H11, page 1, is answ			(====, p======	(
1 2	Net income (loss) per books Income included on Schedule K, lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10, and 11, not recorded on books this tax year (itemize):		lines a Tax	not included on Schedule K, s 1 through 11 (itemize): -exempt interest \$ uctions included on Schedule	
3	Guaranteed payments (other			nes 1 through 13d, and 21, not	
_	than health insurance)			rged against book income this	
4	Expenses recorded on books		•	year (itemize):	
a	this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize): Depreciation \$		а Dep	preciation \$	
	Travel and entertainment \$		8 Add	I lines 6 and 7	
J				ome (loss). Subtract line 8	
5	Add lines 1 through 4			n line 5	
	nedule M-2 Analysis of Partners	' Capital Accounts. (Not	require	ed if Item H11, page 1, is ar	nswered "Yes.")
1	Balance at beginning of tax year	- ,	•	tributions: a Cash	
2	Capital contributed:		O Dio.	b Property	
_	a Cash · · · · ·		7 Oth	er decreases (itemize): \$	
	b Property		. 0.11		
3	Net income (loss) per books				
4	Other increases (itemize): \$				
-			8 Add	I lines 6 and 7	
5	Add lines 1 through 4		9 Bala	ance at end of tax year.	l .

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).

	ibabilon that boodings botween ti	10 1010.g., paranoromp ama a	persone meteu m cene	(4) 4.9 (4).	
	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				
	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				
	Distributions received				
7	Interest received				
8	Other				
9	Add lines 1 through 8				
_	7 da mios i anough o [[[[[
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				
	Commissions paid				
15	Rents, royalties, and license fees paid				
16	Distributions paid				
	Interest paid				
18	Other				
10	Add lines 10 through 18				
	Amounts borrowed (enter the				
_U	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)

Department of the Treasury

(Rev. October 2021)

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		J GO to WWW.III	3.90 1/1 0/1/1000	3 101 1113	tructions and th	ile latest il		tifuing number	
Name of transferor	ODUITITE -	10 EITHT	T.D.					tifying number	
DRAGONEER OPP Name of foreign partners		S FUND VI,	ΤЪ	EIN (if a	nv)		58-06 Reference	33971 ID number (see ins	tructions)
· .	•	C FIIND 177	תז	1	.618627		1.0.0.0.00		
	rship a sections	on 721(c) partr	nership (as de	fined in	Regulations				Yes X No
2 Was any inta	ngible proper	ty transferred orm contribution	considered or	anticipa	ited to be, at t	he time o	of the tran	sfer or at	
		e Under Section		ii Kegu	ations section	1.402-7	C)(1):		Yes X No
raiti mansie	·							(0)	
Type of property	(a) Date of transfer	(b) Description of property	Fair market on date of tra		(d) Cost or other basis	Red	(e) covery period	Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		314	,420.					
Stock, notes									
eceivable and payable, and other									
securities									
nventory									
- · · · · · · · · · · · · · · · · · · ·									
Гangible property									
used in trade									
or business									
ntangible									
ntangible property									
lescribed in									
section 197(f)(9)									
ntangible property,									
other than intangible									
property described									
n section 197(f)(9)									
Other									
property									
Totals				,420.					
		entage interes				fer	NONE %	(b) After the trans	sfer 0.672 %
Supplemental Infor	rmation Requ	iired To Be Rep	oorted (see in	structio	ns):				
Part Disposi	tions Report	able Under Sec	ction 6038B				n		T
(a) Type of property o	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition		(e) ain recognized y partnership	Depre recal recog by part	oture nized	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner
ls any t	ransfer repor	ted on this sch	nedule subjec	t to nai	n recognition	under se	ection 904	(f)(3) or	1
2614 201	-		-	•	•			```	Yes X No
2601011	30 4 (1)(3)(□)?								169 V

PUBLIC INSPECTION CQPY₈₋₀₆₃₃₉₇₁

ITEM H4 - CUSTODIAN OF BOOKS AND RECORDS

NAME LINE 1: PAT ROBERTSON

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA 94129 ZIP:

SCHEDULE A-3 - AFFILIATION SCHEDULE

NAME LINE 1: BESTIE DF HOLDINGS, LP

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

SAN FRANCISCO

STATE: CA 94129 ZIP:

98-1671322 TD:

FOREIGN PARTNERSHIP: X

NAME LINE 1: BODEGA DF HOLDINGS, LP

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA 94129 ZIP: 98-1619783 TD:

FOREIGN PARTNERSHIP: X

NAME LINE 1: CASING DF HOLDINGS, LP

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CAZIP: 94129

87-1507810 ID:

NAME LINE 1: CONVERSE DF HOLDINGS, LP

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA 94129 ZIP:

88-2302205 ID:

NAME LINE 1: CURRANT DF HOLDINGS, LP

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

SAN FRANCISCO CITY:

STATE: CA 94129 ZIP:

ID: 88-1478080

SCHEDULE A-3 - AFFILIATION SCHEDULE (CONT'D)

NAME LINE 1:

FACTORIAL DF HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500 SAN FRANCISCO ADDRESS LINE 1:

CA STATE: 94129 ZIP:

87-4672559 ID:

NAME LINE 1: ADDRESS LINE 1:

INFLUENCE DF HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA 94129 ZIP:

88-1992075 ID:

NAME LINE 1: ADDRESS LINE 1:

KHALEESI DF HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA 94129 ZIP:

88-4215489 TD:

NAME LINE 1: ADDRESS LINE 1: LATITUDE DF HOLDINGS, LP

1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA ZIP: 94129

87-3281801 ID:

NAME LINE 1: ADDRESS LINE 1:

LYCHEE DF HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500

SAN FRANCISCO CITY:

STATE: CA 94129 ZIP:

ID: 87-3857128

METROID DF HOLDINGS, LP

NAME LINE 1: ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA94129 ZIP:

SCHEDULE A-3 - AFFILIATION SCHEDULE (CONT'D)

ID: 86-1437064

NAME LINE 1: MIRROR DF HOLDINGS, LP

NAME LINE 1:
ADDRESS LINE 1:
CITY: 1 LETTERMAN DRIVE, BLDG D, STE M500 SAN FRANCISCO

CITY:

STATE: CA 94129 ZIP:

87-4019274 ID:

NAME LINE 1: OASIS FD HOLDINGS, LP

NAME LINE 1: ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

SAN FRANCISCO

CA STATE: 94129 ZIP:

87-4306346 TD:

NAME LINE 1: PINWHEEL OF HOLDINGS, L.
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500
SAN FRANCISCO

STATE: CA ZIP: 94129

87-4695989 ID:

NAME LINE 1: ADDRESS LINE 1: PRODUCTIVE DF HOLDINGS, LP

1 LETTERMAN DRIVE, BLDG D, STE M500

SAN FRANCISCO CITY:

STATE: CA 94129 ZIP:

TD: 87-4425469

NAME LINE 1: ADDRESS LINE 1:

REIMAGINE DF HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA ZIP: 94129

87-4285165 ID:

STATEMENT 5

FORM 8865, PAGE 2 DETAIL

SCHEDULE A-3 - AFFILIATION SCHEDULE (CONT'D)

NAME LINE 1:

RESOLUTE DF HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500 SAN FRANCISCO ADDRESS LINE 1:

STATE: CA 94129 ZIP:

85-3698341 ID:

NAME LINE 1: REVITALIZE DF HOLDINGS, LP ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA ZIP: 94129

88-0968792 ID:

NAME LINE 1: ADDRESS LINE 1: SATURN FD HOLDINGS, LP 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA 94129 ZIP:

88-3690823 TD:

SHELF DF HOLDINGS, LP

NAME LINE 1: ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA ZIP: 94129

98-1651536 TD:

FOREIGN PARTNERSHIP: X

SPIKE FD INVESTMENTS, LP NAME LINE 1:

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

SAN FRANCISCO

CA STATE: 94129 ZIP:

81506

88-1747263 ID:

NAME LINE 1: TICKET DF HOLDINGS, LP

SCHEDULE A-3 - AFFILIATION SCHEDULE (CONT'D)

ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500

CITY: SAN FRANCISCO

STATE: CA ZIP: 94129

88-1409793 ID: