

**Robert W. Woodruff Arts  
Center**

*Public Inspection Copy*  
**For the Year Ended  
May 31, 2023**

**TAX RETURNS**



**SMITH+HOWARD**  
Advisory LLC

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.

**PUBLIC INSPECTION COPY**



**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**

Department of the Treasury  
Internal Revenue Service

Do not send to the IRS. Keep for your records.  
Go to [www.irs.gov/Form8879TE](http://www.irs.gov/Form8879TE) for the latest information.

Name of filer <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	EIN or SSN <b>58-0633971</b>
Name and title of officer or person subject to tax <b>HALA MODELMOG, PRESIDENT &amp; CEO</b>	

**Part I 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, if any, from the return. Form 8038-CP and Form 5330 filers may enter dollars and cents. For all other forms, enter whole dollars only. If you check the box on line 1a, 2a, 3a, 4a, 5a, 6a, 7a, 8a, 9a, or 10a below, and the amount on that line for the return being filed with this form was blank, then leave line 1b, 2b, 3b, 4b, 5b, 6b, 7b, 8b, 9b, or 10b, whichever is applicable, blank (do not enter -0-). But, if you entered -0- on the return, then enter -0- on the applicable line below. Do not complete more than one line in Part I.

1a Form 990 check here . . . . . <input checked="" type="checkbox"/>	b Total revenue, if any (Form 990, Part VIII, column (A), line 12) . . . . .	1b <u>99817852.</u>
2a Form 990-EZ check here . . . . . <input type="checkbox"/>	b Total revenue, if any (Form 990-EZ, line 9) . . . . .	2b _____
3a Form 1120-POL check here . . . . . <input type="checkbox"/>	b Total tax (Form 1120-POL, line 22) . . . . .	3b _____
4a Form 990-PF check here . . . . . <input type="checkbox"/>	b Tax based on investment income (Form 990-PF, Part V, line 5) . . . . .	4b _____
5a Form 8868 check here . . . . . <input type="checkbox"/>	b Balance due (Form 8868, line 3c) . . . . .	5b _____
6a Form 990-T check here . . . . . <input type="checkbox"/>	b Total tax (Form 990-T, Part III, line 4) . . . . .	6b _____
7a Form 4720 check here . . . . . <input type="checkbox"/>	b Total tax (Form 4720, Part III, line 1) . . . . .	7b _____
8a Form 5227 check here . . . . . <input type="checkbox"/>	b FMV of assets at end of tax year (Form 5227, Item D) . . . . .	8b _____
9a Form 5330 check here . . . . . <input type="checkbox"/>	b Tax due (Form 5330, Part II, line 19) . . . . .	9b _____
10a Form 8038-CP check here . . . . . <input type="checkbox"/>	b Amount of credit payment requested (Form 8038-CP, Part III, line 22) . . . . .	10b _____

**Part II Declaration and Signature Authorization of Officer or Person Subject to Tax**

Under penalties of perjury, I declare that  I am an officer of the above entity or  I am a person subject to tax with respect to (name of entity) \_\_\_\_\_, (EIN) \_\_\_\_\_ and that I have examined a copy of the

2022 electronic return and accompanying schedules and statements, and, to the best of my knowledge and belief, they are true, correct, and complete. I further declare that the amount in Part I above is the amount shown on the copy of the electronic return. I consent to allow my intermediate service provider, transmitter, or electronic return originator (ERO) to send the return to the IRS and to receive from the IRS (a) an acknowledgement of receipt or reason for rejection of the transmission, (b) the reason for any delay in processing the return or refund, and (c) the date of any refund. If applicable, I authorize the U.S. Treasury and its designated Financial Agent to initiate an electronic funds withdrawal (direct debit) entry to the financial institution account indicated in the tax preparation software for payment of the federal taxes owed on this return, and the financial institution to debit the entry to this account. To revoke a payment, I must contact the U.S. Treasury Financial Agent at 1-888-353-4537 no later than 2 business days prior to the payment (settlement) date. I also authorize the financial institutions involved in the processing of the electronic payment of taxes to receive confidential information necessary to answer inquiries and resolve issues related to the payment. I have selected a personal identification number (PIN) as my signature for the electronic return and, if applicable, the consent to electronic funds withdrawal.

**PIN: check one box only**

I authorize SMITH & HOWARD ADVISORY, to enter my PIN 17236 as my signature  
ERO firm name Enter five numbers, but do not enter all zeros

on the tax year 2022 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I also authorize the aforementioned ERO to enter my PIN on the return's disclosure consent screen.

As an officer or person subject to tax with respect to the entity, I will enter my PIN as my signature on the tax year 2022 electronically filed return. If I have indicated within this return that a copy of the return is being filed with a state agency(ies) regulating charities as part of the IRS Fed/State program, I will enter my PIN on the return's disclosure consent screen.

Signature of officer or person subject to tax Hala Modelmog Date 04/15/2024

**Part III Certification and Authentication**

**ERO's EFIN/PIN.** Enter your six-digit electronic filing identification number (EFIN) followed by your five-digit self-selected PIN.

67882792074

Do not enter all zeros

I certify that the above numeric entry is my PIN, which is my signature on the 2022 electronically filed return indicated above. I confirm that I am submitting this return in accordance with the requirements of Pub. 4163, Modernized e-File (MeF) Information for Authorized IRS e-file Providers for Business Returns

ERO's signature Selva Imahan Date 04/15/2024

**ERO Must Retain This Form - See Instructions  
Do Not Submit This Form to the IRS Unless Requested To Do So**

For Privacy Act and Paperwork Reduction Act Notice, see back of form.

Form **8879-TE** (2022)

Return of Organization Exempt From Income Tax

2022

Department of the Treasury Internal Revenue Service

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.

Open to Public Inspection

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

A For the 2022 calendar year, or tax year beginning 06/01/2022 and ending 05/31/2023

Form header section containing organization name (ROBERT W. WOODRUFF ARTS CENTER, INC.), EIN (58-0633971), address (1280 PEACHTREE ST. NE, ATLANTA, GA 30309), and principal officer (HALA MODELMOG).

Part I Summary

Summary table with columns for Activities & Governance, Revenue, Expenses, and Net Assets or Fund Balances. Rows include mission statement, member counts, revenue (Total: 99,817,852), expenses (Total: 108,387,134), and net assets (Total: 667,665,513).

Part II Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Signature block containing signatures of Hala Modelmog (President & CEO) dated 04/15/2024 and Sabre J Linahan (Preparer) dated 04/15/2024.

May the IRS discuss this return with the preparer shown above? See instructions. [X] Yes [ ] No

For Paperwork Reduction Act Notice, see the separate instructions. Form 990 (2022)

Part III Statement of Program Service Accomplishments

Check if Schedule O contains a response or note to any line in this Part III [X]

1 Briefly describe the organization's mission:

THE WOODRUFF ARTS CENTER'S MISSION IS TO INSPIRE, CREATE, SUPPORT, AND CELEBRATE RENOWNED ARTS AND EDUCATION FOR DIVERSE AUDIENCES THROUGH A UNIQUE MODEL OF PARTNERSHIPS AND COLLABORATIONS, AND IN AN INSTITUTIONALLY SUSTAINABLE MANNER.

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? [ ] Yes [X] No

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? [ ] Yes [X] No

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code: ) (Expenses \$ 40,972,100. including grants of \$ ) (Revenue \$ 19,067,266. )

ATLANTA SYMPHONY ORCHESTRA: THE ATLANTA SYMPHONY ORCHESTRA UNITES, EDUCATES, AND ENRICHES OUR COMMUNITY THROUGH THE ENGAGING AND TRANSFORMATIVE POWER OF ORCHESTRAL MUSIC EXPERIENCES. MORE THAN 150 CONCERTS ARE PERFORMED EACH YEAR INCLUDING THE DELTA CLASSICAL SERIES, MOVIES IN CONCERT, FAMILY CONCERT SERIES, ATLANTA SYMPHONY HALL LIVE AND THE COCA-COLA HOLIDAY SERIES, AS WELL AS COMMUNITY AND EDUCATION CONCERTS. WITH EXCELLENT LIVE PERFORMANCES, IMPRESSIVE GUEST ARTISTS, A RENOWNED CHORUS, AND ENGAGING EDUCATION INITIATIVES, THE GRAMMY® AWARD WINNING ATLANTA SYMPHONY ORCHESTRA CONTINUES TO BE A LEADER IN ITS INDUSTRY.

4b (Code: ) (Expenses \$ 25,226,299. including grants of \$ ) (Revenue \$ 4,237,170. )

SEE SCHEDULE O

4c (Code: ) (Expenses \$ 17,408,413. including grants of \$ ) (Revenue \$ 6,961,065. )

SEE SCHEDULE O

4d Other program services (Describe on Schedule O.) (Expenses \$ including grants of \$ ) (Revenue \$ )

4e Total program service expenses 83,606,812.

Part IV Checklist of Required Schedules

Table with 3 columns: Question Number, Yes, No. Rows 1-21 with various questions about organizational activities and financial reporting. Includes sub-questions a-f for items 11 and 12.

Part IV Checklist of Required Schedules (continued)

Table with 3 columns: Question number, Yes, No. Rows 22-38 covering various organizational requirements and reporting obligations.

Part V Statements Regarding Other IRS Filings and Tax Compliance

Check if Schedule O contains a response or note to any line in this Part V [ ]

Table with 3 columns: Question number, Yes, No. Rows 1a-1c regarding Form 1096, W-2G forms, and backup withholding rules.



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

Part VI Governance, Management, and Disclosure. For each "Yes" response to lines 2 through 7b below, and for a "No" 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 [X]

Section A. Governing Body and Management

Table with 3 columns: Question, Yes, No. Rows include 1a (126), 1b (125), 2, 3, 4, 5, 6, 7a, 7b, 8a, 8b, 9.

Section B. Policies (This Section B requests information about policies not required by the Internal Revenue Code.)

Table with 3 columns: Question, Yes, No. Rows include 10a, 10b, 11a, 11b, 12a, 12b, 12c, 13, 14, 15a, 15b, 16a, 16b.

Section C. Disclosure

- 17 List the states with which a copy of this Form 990 is required to be filed SEE SCHEDULE O
18 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.
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
404-733-4200

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

Check if Schedule O contains a response or note to any line in this Part VII  X

**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)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(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
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(1) RAND SUFFOLK HIGH MUSEUM DIRECTOR	40.00 NONE				X			624,034.	NONE	66,235.
(2) HALA MODDELMOG PRESIDENT	40.00 NONE	X		X				511,889.	NONE	4,636.
(3) SUSAN BOOTH ARISTIC DIRECTOR - AT	40.00 NONE				X			459,073.	NONE	32,690.
(4) JENNIFER BARLAMENT EXECUTIVE DIRECTOR - ASO	40.00 NONE				X			403,682.	NONE	59,078.
(5) MICHAEL SCHLEIFER INTERIM EXECUTVIE DIRECTOR	40.00 NONE				X			324,637.	NONE	40,382.
(6) BRADY LUM DEPUTY DIRECTOR	40.00 NONE				X			298,044.	NONE	41,352.
(7) SUSAN AMBO CFO ASO	40.00 NONE				X			316,963.	NONE	11,356.
(8) KRISTIN HANSEN CHIEF DEVELOPMENT OFFICER	40.00 NONE				X			272,531.	NONE	10,920.
(9) DAVID COUCHERON CONCERTMASTER	40.00 NONE					X		257,828.	NONE	11,590.
(10) ELEANOR TARVIN CHIEF HUMAN RESOURCES OFFICER	40.00 NONE				X			249,558.	NONE	18,748.
(11) BETH GIBBS GENERAL COUNSEL	40.00 NONE			X				235,886.	NONE	6,028.
(12) BRIAN WALLEY CFO (EFFECTIVE 06/01/2022)	40.00 NONE			X				214,080.	NONE	23,552.
(13) ROBERT SPANO MUSIC DIRECTOR	40.00 NONE				X			210,694.	NONE	19,921.
(14) KAMA PIERCE SR VP OF STRATEGY	40.00 NONE					X		198,048.	NONE	7,897.

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 7 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like GRACE SIPUSIC, KEVIN TUCKER, BRIAN SHIVELY, etc.

2 Total number of individuals (including but not limited to those listed above) who received more than \$100,000 of reportable compensation from the organization 91

Table with 3 columns: Question, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Currently empty.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like GALEN L. OELKERS, GLENN W. MITCHELL III, etc.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row at the bottom.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like ALDO LAFIANDRA, ALI (AL) AZADI, etc.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row for independent contractors.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like BRENDAN DOHERTY, BRIAN MAHONY, etc.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row for independent contractors.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like COLIN CONNOLLY, DAVID DASE, etc.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row for independent contractors.

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



Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include Gregory H. Worthy, Harvey Green, Howard D. Palefsky, J. Veronica Biggins, James B. Hannan, James H. Simpson III, James W. Boswell, Jamila M. Hall, Jane D. Lanier, Janet Simpson, and Janine Brown.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row for independent contractors.

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

**Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees** (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
( 81 ) JENNA KELLY VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 82 ) JIMMY ETHEREDGE VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 83 ) JOAN ABERNATHY VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 84 ) JOE W. ROGERS, JR. VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 85 ) JOHN MURPHY VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 86 ) JOHN S. MARKWALTER, JR. VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 87 ) JOHNSON COOK VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 88 ) JON BRIDGES VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 89 ) JORDY GAMSON VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 90 ) JOSEPH O. BLANCO VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
( 91 ) JOSHUA M. KAMIN VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
<b>1b Sub-total</b> . . . . .										
<b>c Total from continuation sheets to Part VII, Section A</b> . . . . .										
<b>d Total (add lines 1b and 1c)</b> . . . . .										

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

	Yes	No
3 Did the organization list any <b>former</b> officer, director, or trustee, key employee, or highest compensated employee on line 1a? <i>If "Yes," complete Schedule J for such individual</i> . . . . .	3	
4 For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? <i>If "Yes," complete Schedule J for such individual</i> . . . . .	4	
5 Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? <i>If "Yes," complete Schedule J for such person</i> . . . . .	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 ▶

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include Julie Ann Crommett, Kappy Debutts, Kate Kiefer Lee, Katherine Saez, Kathryn Petralia, Kevin Gooch, Kit Hughes, Kjell Gruner, Kristen Sario, Kurt P. Kuehn, and Lacey Jordan.

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

Table with 3 columns: Question, Yes, No. Questions 3, 4, and 5 regarding compensation reporting and unrelated organizations.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Rows for independent contractors.

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

**Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees** (continued)

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC)	(E) Reportable compensation from related organizations (W-2/1099-MISC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional trustee	Officer	Key employee	Highest compensated employee	Former			
(103) LARRY MARK VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(104) LAURA LANE VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(105) LEE ECHOLS VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(106) LEIGHANN COSTLEY VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(107) LINNEA GEISS VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(108) LISA CALHOUN VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(109) LIZANNE THOMAS VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(110) LOUISE SAMS VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(111) LOVETTE RUSSELL VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(112) LYLE TICK VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
(113) MARY L. CAHILL VOTING TRUSTEE	1.00 NONE	X					NONE	NONE	NONE	
<b>1b Sub-total</b> . . . . .										
<b>c Total from continuation sheets to Part VII, Section A</b> . . . . .										
<b>d Total (add lines 1b and 1c)</b> . . . . .										

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

	Yes	No
<b>3</b> Did the organization list any <b>former</b> officer, director, or trustee, key employee, or highest compensated employee on line 1a? <i>If "Yes," complete Schedule J for such individual</i> . . . . .		
<b>4</b> For any individual listed on line 1a, is the sum of reportable compensation and other compensation from the organization and related organizations greater than \$150,000? <i>If "Yes," complete Schedule J for such individual</i> . . . . .		
<b>5</b> Did any person listed on line 1a receive or accrue compensation from any unrelated organization or individual for services rendered to the organization? <i>If "Yes," complete Schedule J for such person</i> . . . . .		

**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 ▶

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 7 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like MELISSA BABB, MERIA JOEL CARSTARPHEN, ED.D, etc.

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

Table with 3 columns: Question, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row for independent contractors.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like PAT GUNNING, PAT MITCHELL, PAUL E. VIERA, etc.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row at the bottom.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include individuals like RYAN WILSON, S. STEPHEN SELIG, III, SANJAY PAREKH, etc.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Includes a total row for independent contractors.

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

Part VII Section A. Officers, Directors, Trustees, Key Employees, and Highest Compensated Employees (continued)

Table with 6 main columns: (A) Name and title, (B) Average hours per week, (C) Position, (D) Reportable compensation from the organization, (E) Reportable compensation from related organizations, (F) Estimated amount of other compensation. Rows include W. STANLEY BLACKBURN, WAB P. KADABA, WILLIAM H. LINGINFELTER, and WILLIAM PATE.

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

Table with 3 columns: Question number, Yes, No. Contains questions 3, 4, and 5 regarding compensation reporting.

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.

Table with 3 columns: (A) Name and business address, (B) Description of services, (C) Compensation. Row 1 contains 'SEE SCHEDULE O'.

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



Part VIII Statement of Revenue

Check if Schedule O contains a response or note to any line in this Part VIII

Table with columns: (A) Total revenue, (B) Related or exempt function revenue, (C) Unrelated business revenue, (D) Revenue excluded from tax under sections 512-514. Rows include Contributions, Grants, and Other Similar Amounts; Program Service Revenue; Other Revenue; and Miscellaneous Revenue.

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 response or note to any line in this Part IX

Table with 5 columns: (A) Total expenses, (B) Program service expenses, (C) Management and general expenses, (D) Fundraising expenses. Rows include categories like Grants, Compensation, Salaries, Pension, Payroll, Advertising, etc.

Part X Balance Sheet

Check if Schedule O contains a response or note to any line in this Part X [X]

Table with columns (A) Beginning of year, (B) End of year. Rows include Assets (1-16), Liabilities (17-26), and Net Assets or Fund Balances (27-33). Values range from 28,773,473 to 667,665,513.

Part XI Reconciliation of Net Assets

Check if Schedule O contains a response or note to any line in this Part XI [X]

Table with 10 rows for reconciliation of net assets. Line 1: Total revenue 99,817,852. Line 2: Total expenses 108,387,134. Line 3: Revenue less expenses -8,569,282. Line 4: Net assets at beginning 477,009,840. Line 5: Net unrealized gains 7,368,355. Line 6: Donated services. Line 7: Investment expenses. Line 8: Prior period adjustments -452,590. Line 9: Other changes -2,412,480. Line 10: Net assets at end of year 472,943,843.

Part XII Financial Statements and Reporting

Check if Schedule O contains a response or note to any line in this Part XII. [ ]

- 1 Accounting method used to prepare the Form 990: [ ] Cash [X] Accrual [ ] Other
2a Were the organization's financial statements compiled or reviewed by an independent accountant?
2b Were the organization's financial statements audited by an independent accountant?
2c If "Yes" to line 2a or 2b, does the organization have a committee that assumes responsibility for oversight of the audit, review, or compilation of its financial statements and selection of an independent accountant?
3a As a result of a federal award, was the organization required to undergo an audit or audits as set forth in the Uniform Guidance, 2 C.F.R. Part 200, Subpart F?
3b If "Yes," did the organization undergo the required audit or audits? If the organization did not undergo the required audit or audits, explain why on Schedule O and describe any steps taken to undergo such audits.

Table with 3 columns: Question, Yes, No. Row 2a: Yes [ ], No [X]. Row 2b: Yes [X], No [ ]. Row 2c: Yes [X], No [ ]. Row 3a: Yes [ ], No [X]. Row 3b: Yes [ ], No [ ].

Form 990 (2022)

**SCHEDULE A  
(Form 990)**

Department of the Treasury  
Internal Revenue Service

**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](http://www.irs.gov/Form990) for instructions and the latest information.

OMB No. 1545-0047

**2022**

**Open to Public  
Inspection**

Name of the organization <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	Employer identification number <b>58-0633971</b>
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**Part I Reason for Public Charity Status.** (All organizations must complete this part.) See instructions.

The organization is not a private foundation because it is: (For lines 1 through 12, check only one box.)

- 1  A church, convention of churches, or association of churches described in **section 170(b)(1)(A)(i)**.
- 2  A school described in **section 170(b)(1)(A)(ii)**. (Attach Schedule E (Form 990).)
- 3  A hospital or a cooperative hospital service organization described in **section 170(b)(1)(A)(iii)**.
- 4  A medical research organization operated in conjunction with a hospital described in **section 170(b)(1)(A)(iii)**. Enter the hospital's name, city, and state: \_\_\_\_\_
- 5  An organization operated for the benefit of a college or university owned or operated by a governmental unit described in **section 170(b)(1)(A)(iv)**. (Complete Part II.)
- 6  A federal, state, or local government or governmental unit described in **section 170(b)(1)(A)(v)**.
- 7  An organization that normally receives a substantial part of its support from a governmental unit or from the general public described in **section 170(b)(1)(A)(vi)**. (Complete Part II.)
- 8  A community trust described in **section 170(b)(1)(A)(vi)**. (Complete Part II.)
- 9  An agricultural research organization described in **section 170(b)(1)(A)(ix)** operated in conjunction with a land-grant college or university or a non-land-grant college of agriculture (see instructions). Enter the name, city, and state of the college or university: \_\_\_\_\_
- 10  An organization that normally receives (1) more than 33 1/3 % 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 33 1/3 % 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 and operated exclusively to test for public safety. See **section 509(a)(4)**.
- 12  An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in **section 509(a)(1)** or **section 509(a)(2)**. See **section 509(a)(3)**. Check the box on lines 12a through 12d that describes the type of supporting organization and complete lines 12e, 12f, and 12g.
  - a  **Type I.** A supporting organization operated, supervised, or controlled by its supported organization(s), typically by giving the supported organization(s) the power to regularly appoint or elect a majority of the directors or trustees of the supporting organization. **You must complete Part IV, Sections A and B.**
  - b  **Type II.** A supporting organization supervised or controlled in connection with its supported organization(s), by having control or management of the supporting organization vested in the same persons that control or manage the supported organization(s). **You must complete Part IV, Sections A and C.**
  - c  **Type III functionally integrated.** A supporting organization operated in connection with, and functionally integrated with, its supported organization(s) (see instructions). **You must complete Part IV, Sections A, D, and E.**
  - d  **Type III non-functionally integrated.** A supporting organization operated in connection with its supported organization(s) that is not functionally integrated. The organization generally must satisfy a distribution requirement and an attentiveness requirement (see instructions). **You must complete Part IV, Sections A and D, and Part V.**
  - e  Check this box if the organization received a written determination from the IRS that it is a Type I, Type II, Type III functionally integrated, or Type III non-functionally integrated supporting organization.
  - f Enter the number of supported organizations . . . . .
  - g Provide the following information about the supported organization(s).

(i) Name of supported organization	(ii) EIN	(iii) Type of organization (described on lines 1-10 above (see instructions))	(iv) Is the organization listed in your governing document?		(v) Amount of monetary support (see instructions)	(vi) Amount of other support (see instructions)
			Yes	No		
(A)						
(B)						
(C)						
(D)						
(E)						
<b>Total</b>						

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.)

Section A. Public Support

Table with 7 columns: Calendar year (or fiscal year beginning in), (a) 2018, (b) 2019, (c) 2020, (d) 2021, (e) 2022, (f) Total. Rows include: 1 Gifts, grants, contributions, and membership fees received; 2 Tax revenues levied for the organization's benefit; 3 The value of services or facilities furnished by a governmental unit; 4 Total; 5 The portion of total contributions by each person; 6 Public support.

Section B. Total Support

Table with 7 columns: Calendar year (or fiscal year beginning in), (a) 2018, (b) 2019, (c) 2020, (d) 2021, (e) 2022, (f) Total. Rows include: 7 Amounts from line 4; 8 Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources; 9 Net income from unrelated business activities; 10 Other income; 11 Total support; 12 Gross receipts from related activities; 13 First 5 years.

Section C. Computation of Public Support Percentage

Table with 2 columns: Line number, Percentage. Rows include: 14 Public support percentage for 2022 (76.24%); 15 Public support percentage from 2021 Schedule A, Part II, line 14 (74.15%); 16a 33 1/3% support test - 2022 (checked); 16b 33 1/3% support test - 2021; 17a 10%-facts-and-circumstances test - 2022; 17b 10%-facts-and-circumstances test - 2021; 18 Private foundation.

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.)

Section A. Public Support

Table with 7 columns: Calendar year (or fiscal year beginning in), (a) 2018, (b) 2019, (c) 2020, (d) 2021, (e) 2022, (f) Total. Rows include: 1 Gifts, grants, contributions, and membership fees received; 2 Gross receipts from admissions, merchandise sold or services performed; 3 Gross receipts from activities that are not an unrelated trade or business; 4 Tax revenues levied for the organization's benefit; 5 The value of services or facilities furnished by a governmental unit; 6 Total; 7a, 7b Disqualified persons; 8 Public support.

Section B. Total Support

Table with 7 columns: Calendar year (or fiscal year beginning in), (a) 2018, (b) 2019, (c) 2020, (d) 2021, (e) 2022, (f) Total. Rows include: 9 Amounts from line 6; 10a Gross income from interest, dividends, payments received on securities loans, rents, royalties, and income from similar sources; 10b Unrelated business taxable income; 10c Add lines 10a and 10b; 11 Net income from unrelated business activities; 12 Other income; 13 Total support.

14 First 5 years. If the Form 990 is for the organization's first, second, third, fourth, or fifth tax year as a section 501(c)(3) organization, check this box and stop here.

Section C. Computation of Public Support Percentage

Table with 3 columns: Description, 2022, 2021. Row 15: Public support percentage for 2022; Row 16: Public support percentage from 2021 Schedule A, Part III, line 15.

Section D. Computation of Investment Income Percentage

Table with 3 columns: Description, 2022, 2021. Row 17: Investment income percentage for 2022; Row 18: Investment income percentage from 2021 Schedule A, Part III, line 17.

19a 33 1/3% support tests - 2022. If the organization did not check the box on line 14, and line 15 is more than 33 1/3%, and line 17 is not more than 33 1/3%, check this box and stop here.

19b 33 1/3% support tests - 2021. If the organization did not check a box on line 14 or line 19a, and line 16 is more than 33 1/3%, and line 18 is not more than 33 1/3%, check this box and stop here.

20 Private foundation. If the organization did not check a box on line 14, 19a, or 19b, check this box and see instructions.

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

Table with 3 columns: Question, Yes, No. Rows 1-10b detailing supporting organization requirements.



Part IV Supporting Organizations (continued)

Table with 3 columns: Question, Yes, No. Row 11: Has the organization accepted a gift or contribution from any of the following persons? Sub-rows 11a, 11b, 11c.

Section B. Type I Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 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? Row 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?

Section C. Type II Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 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)?

Section D. All Type III Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 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? Row 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? Row 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?

Section E. Type III Functionally Integrated Supporting Organizations

Table with 3 columns: Question, Yes, No. Row 1: Check the box next to the method that the organization used to satisfy the Integral Part Test during the year (see instructions). Sub-rows a, b, c. Row 2: Activities Test. Answer lines 2a and 2b below. Sub-rows a, b. Row 3: Parent of Supported Organizations. Answer lines 3a and 3b below. Sub-rows a, b.

**Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations**

**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.

<b>Section A - Adjusted Net Income</b>		(A) Prior Year	(B) Current Year (optional)
<b>1</b>	Net short-term capital gain	<b>1</b>	
<b>2</b>	Recoveries of prior-year distributions	<b>2</b>	
<b>3</b>	Other gross income (see instructions)	<b>3</b>	
<b>4</b>	Add lines 1 through 3.	<b>4</b>	
<b>5</b>	Depreciation and depletion	<b>5</b>	
<b>6</b>	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)	<b>6</b>	
<b>7</b>	Other expenses (see instructions)	<b>7</b>	
<b>8</b>	<b>Adjusted Net Income</b> (subtract lines 5, 6, and 7 from line 4)	<b>8</b>	

<b>Section B - Minimum Asset Amount</b>		(A) Prior Year	(B) Current Year (optional)
<b>1</b>	Aggregate fair market value of all non-exempt-use assets (see instructions for short tax year or assets held for part of year):		
<b>a</b>	Average monthly value of securities	<b>1a</b>	
<b>b</b>	Average monthly cash balances	<b>1b</b>	
<b>c</b>	Fair market value of other non-exempt-use assets	<b>1c</b>	
<b>d</b>	<b>Total</b> (add lines 1a, 1b, and 1c)	<b>1d</b>	
<b>e</b>	<b>Discount</b> claimed for blockage or other factors ( <i>explain in detail in Part VI</i> ):		
<b>2</b>	Acquisition indebtedness applicable to non-exempt-use assets	<b>2</b>	
<b>3</b>	Subtract line 2 from line 1d.	<b>3</b>	
<b>4</b>	Cash deemed held for exempt use. Enter 0.015 of line 3 (for greater amount, see instructions).	<b>4</b>	
<b>5</b>	Net value of non-exempt-use assets (subtract line 4 from line 3)	<b>5</b>	
<b>6</b>	Multiply line 5 by 0.035.	<b>6</b>	
<b>7</b>	Recoveries of prior-year distributions	<b>7</b>	
<b>8</b>	<b>Minimum Asset Amount</b> (add line 7 to line 6)	<b>8</b>	

<b>Section C - Distributable Amount</b>			Current Year
<b>1</b>	Adjusted net income for prior year (from Section A, line 8, column A)	<b>1</b>	
<b>2</b>	Enter 0.85 of line 1.	<b>2</b>	
<b>3</b>	Minimum asset amount for prior year (from Section B, line 8, column A)	<b>3</b>	
<b>4</b>	Enter greater of line 2 or line 3.	<b>4</b>	
<b>5</b>	Income tax imposed in prior year	<b>5</b>	
<b>6</b>	<b>Distributable Amount.</b> Subtract line 5 from line 4, unless subject to emergency temporary reduction (see instructions).	<b>6</b>	
<b>7</b>	<input type="checkbox"/> Check here if the current year is the organization's first as a non-functionally integrated Type III supporting organization (see instructions).		

**Part V Type III Non-Functionally Integrated 509(a)(3) Supporting Organizations (continued)**

Section D - Distributions		Current Year
1	Amounts paid to supported organizations to accomplish exempt purposes	1
2	Amounts paid to perform activity that directly furthers exempt purposes of supported organizations, in excess of income from activity	2
3	Administrative expenses paid to accomplish exempt purposes of supported organizations	3
4	Amounts paid to acquire exempt-use assets	4
5	Qualified set-aside amounts (prior IRS approval required - <i>provide details in Part VI</i> )	5
6	Other distributions ( <i>describe in Part VI</i> ). See instructions.	6
7	<b>Total annual distributions.</b> Add lines 1 through 6.	7
8	Distributions to attentive supported organizations to which the organization is responsive ( <i>provide details in Part VI</i> ). See instructions.	8
9	Distributable amount for 2022 from Section C, line 6	9
10	Line 8 amount divided by line 9 amount	10

Section E - Distribution Allocations (see instructions)		(i) Excess Distributions	(ii) Underdistributions Pre-2022	(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 - <i>explain in Part VI</i> ). See instructions.			
3	Excess distributions carryover, if any, to 2022			
a	From 2017 . . . . .			
b	From 2018 . . . . .			
c	From 2019 . . . . .			
d	From 2020 . . . . .			
e	From 2021 . . . . .			
f	<b>Total</b> 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: \$			
a	Applied to underdistributions of prior years			
b	Applied to 2022 distributable amount			
c	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, <i>explain in Part VI</i> . See instructions.			
6	Remaining underdistributions for 2022. Subtract lines 3h and 4b from line 1. For result greater than zero, <i>explain in Part VI</i> . See instructions.			
7	<b>Excess distributions carryover to 2023.</b> Add lines 3j and 4c.			
8	Breakdown of line 7:			
a	Excess from 2018 . . . .			
b	Excess from 2019 . . . .			
c	Excess from 2020 . . . .			
d	Excess from 2021 . . . .			
e	Excess from 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 INCOME

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.

Schedule B (Form 990)

Department of the Treasury Internal Revenue Service

Schedule of Contributors

Attach to Form 990 or Form 990-PF. Go to www.irs.gov/Form990 for the latest information.

OMB No. 1545-0047

2022

Name of the organization

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

Organization type (check one):

Filers of:

Section:

Form 990 or 990-EZ

[X] 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

[X] 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 totaling \$5,000 or more during the year . . . . . \$ \_\_\_\_\_

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

Name of organization <p style="text-align: center;">ROBERT W. WOODRUFF ARTS CENTER, INC.</p>	Employer identification number <p style="text-align: center;">58-0633971</p>
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**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 <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input checked="" type="checkbox"/> (Complete Part II for noncash contributions.)
2	N/A	\$ 1,642,392.	Person <input checked="" type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
		\$	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
		\$	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
		\$	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)
		\$	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II for noncash contributions.)

Name of organization <p style="text-align: center;">ROBERT W. WOODRUFF ARTS CENTER, INC.</p>	Employer identification number <p style="text-align: center;">58-0633971</p>
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**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
_____	_____ _____ _____	\$ _____	_____
_____	_____ _____ _____	\$ _____	_____
_____	_____ _____ _____	\$ _____	_____
_____	_____ _____ _____	\$ _____	_____
_____	_____ _____ _____	\$ _____	_____
_____	_____ _____ _____	\$ _____	_____

Name of organization ROBERT W. WOODRUFF ARTS CENTER, INC.	Employer identification number 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 Part I	(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 Part I	(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 Part I	(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 Part I	(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



SCHEDULE C (Form 990)

Political Campaign and Lobbying Activities

OMB No. 1545-0047

2022

Open to Public Inspection

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.

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.

If the organization answered "Yes," on Form 990, Part IV, line 5 (Proxy Tax) (See separate instructions) or Form 990-EZ, Part V, line 35c (Proxy Tax) (See separate instructions), then

- Section 501(c)(4), (5), or (6) organizations: Complete Part III.

Table with 2 columns: Name of organization (ROBERT W. WOODRUFF ARTS CENTER, INC.) and Employer identification number (58-0633971)

Part I-A Complete if the organization is exempt under section 501(c) or is a section 527 organization.

- 1 Provide a description of the organization's direct and indirect political campaign activities in Part IV. See instructions for definition of "political campaign activities."
2 Political campaign activity expenditures. See instructions \$
3 Volunteer hours for political campaign activities. See instructions

Part I-B Complete if the organization is exempt under section 501(c)(3).

- 1 Enter the amount of any excise tax incurred by the organization under section 4955. \$
2 Enter the amount of any excise tax incurred by organization managers under section 4955. \$
3 If the organization incurred a section 4955 tax, did it file Form 4720 for this year? Yes No
4a Was a correction made? Yes No
b If "Yes," describe in Part IV.

Part I-C Complete if the organization is exempt under section 501(c), except section 501(c)(3).

- 1 Enter the amount directly expended by the filing organization for section 527 exempt function activities. \$
2 Enter the amount of the filing organization's funds contributed to other organizations for section 527 exempt function activities. \$
3 Total exempt function expenditures. Add lines 1 and 2. Enter here and on Form 1120-POL, line 17b. \$
4 Did the filing organization file Form 1120-POL for this year? Yes No
5 Enter the names, addresses and employer identification number (EIN) of all section 527 political organizations to which the filing organization made payments. For each organization listed, enter the amount paid from the filing organization's funds. Also enter the amount of political contributions received that were promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, provide information in Part IV.

Table with 5 columns: (a) Name, (b) Address, (c) EIN, (d) Amount paid from filing organization's funds, (e) Amount of political contributions received and promptly and directly delivered to a separate political organization.

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

Schedule C (Form 990) 2022

Part II-A Complete if the organization is exempt under section 501(c)(3) and filed Form 5768 (election under section 501(h)).

- A Check [ ] if the filing organization belongs to an affiliated group (and list in Part IV each affiliated group member's name, address, EIN, expenses, and share of excess lobbying expenditures).
B Check [ ] if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures (The term "expenditures" means amounts paid or incurred.)
Table with columns (a) Filing organization's totals and (b) Affiliated group totals. Rows include 1a Total lobbying expenditures to influence public opinion, 1b Total lobbying expenditures to influence a legislative body, 1c Total lobbying expenditures (add lines 1a and 1b), 1d Other exempt purpose expenditures, 1e Total exempt purpose expenditures (add lines 1c and 1d), 1f Lobbying nontaxable amount, 1g Grassroots nontaxable amount, 1h Subtract line 1g from line 1a, 1i Subtract line 1f from line 1c, and 1j If there is an amount other than zero on either line 1h or line 1i, did the organization file Form 4720 reporting section 4911 tax for this year?

4-Year Averaging Period Under Section 501(h)

(Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the separate instructions for lines 2a through 2f.)

Lobbying Expenditures During 4-Year Averaging Period
Table with columns (a) 2019, (b) 2020, (c) 2021, (d) 2022, and (e) Total. Rows include 2a 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)), and 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)).

Table with 3 main columns: Description, (a) Yes/No, and (b) Amount. Rows include questions about lobbying activities like volunteers, staff, media, mailings, etc.

Part III-A Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6).

Table with 3 columns: Question, Yes, No. Questions about dues, lobbying expenditures, and carryover.

Part III-B Complete if the organization is exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) and if either (a) BOTH Part III-A, lines 1 and 2, are answered "No" OR (b) Part III-A, line 3, is answered "Yes."

Table with 2 main columns: Description and Amount. Rows include dues, section 162(e) expenditures, and aggregate amounts.

Part IV Supplemental Information

Provide the descriptions required for Part I-A, line 1; Part I-B, line 4; Part I-C, line 5; Part II-A (affiliated group list); Part II-A, lines 1 and 2 (See instructions); and Part II-B, line 1. Also, complete this part for any additional information.

Blank lines for providing supplemental information as required by the instructions.

SCHEDULE D (Form 990)

Supplemental Financial Statements

OMB No. 1545-0047

2022

Open to Public Inspection

Department of the Treasury Internal Revenue Service

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.

Name of the organization

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

Part I Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts.

Complete if the organization answered "Yes" on Form 990, Part IV, line 6.

Table with 3 columns: Line number, Description, (a) Donor advised funds, (b) Funds and other accounts. Includes questions 1-6 regarding donor advised funds.

Part II Conservation Easements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 7.

Table with 3 columns: Line number, Description, Held at the End of the Tax Year. Includes questions 1-9 regarding conservation easements.

Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets.

Complete if the organization answered "Yes" on Form 990, Part IV, line 8.

Table with 3 columns: Line number, Description, Amount. Includes questions 1a, 1b, 2, 2a, 2b regarding art and historical treasures.

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

Schedule D (Form 990) 2022

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Part III Organizations Maintaining Collections of Art, Historical Treasures, or Other Similar Assets (continued)

3 Using the organization's acquisition, accession, and other records, check any of the following that make significant use of its collection items (check all that apply):

- a [X] Public exhibition
b [X] Scholarly research
c [X] Preservation for future generations
d [X] Loan or exchange program
e [ ] Other

4 Provide a description of the organization's collections and explain how they further the organization's exempt purpose in Part XIII.

5 During the year, did the organization solicit or receive donations of art, historical treasures, or other similar assets to be sold to raise funds rather than to be maintained as part of the organization's collection? [ ] Yes [X] No

Part IV Escrow and Custodial Arrangements.

Complete if the organization answered "Yes" on Form 990, Part IV, line 9, or reported an amount on Form 990, Part X, line 21.

1a Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part X? [ ] Yes [ ] No

b If "Yes," explain the arrangement in Part XIII and complete the following table:

Table with 2 columns: Description, Amount. Rows: 1c Beginning balance, 1d Additions during the year, 1e Distributions during the year, 1f Ending balance.

2a Did the organization include an amount on Form 990, Part X, line 21, for escrow or custodial account liability? [ ] Yes [ ] No

b If "Yes," explain the arrangement in Part XIII. Check here if the explanation has been provided on Part XIII [ ]

Part V Endowment Funds.

Complete if the organization answered "Yes" on Form 990, Part IV, line 10.

Table with 6 columns: (a) Current year, (b) Prior year, (c) Two years back, (d) Three years back, (e) Four years back. Rows: 1a Beginning of year balance, b Contributions, c Net investment earnings, gains, and losses, d Grants or scholarships, e Other expenditures for facilities and programs, f Administrative expenses, g End of year balance.

2 Provide the estimated percentage of the current year end balance (line 1g, column (a)) held as:

- a Board designated or quasi-endowment 12.8800 %
b Permanent endowment 79.0100 %
c Term endowment 8.1100 %

The percentages on lines 2a, 2b, and 2c should equal 100%.

3a Are there endowment funds not in the possession of the organization that are held and administered for the organization by:

Table with 2 columns: Yes, No. Rows: 3a(i) Unrelated organizations, 3a(ii) Related organizations, 3b If "Yes" on line 3a(ii), are the related organizations listed as required on Schedule R?

4 Describe in Part XIII the intended uses of the organization's endowment funds.

Part VI Land, Buildings, and Equipment.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11a. See Form 990, Part X, line 10.

Table with 5 columns: (a) Cost or other basis (investment), (b) Cost or other basis (other), (c) Accumulated depreciation, (d) Book value. Rows: 1a Land, b Buildings, c Leasehold improvements, d Equipment, e Other, 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 "Yes" on Form 990, Part IV, line 11b. See Form 990, Part X, line 12.

Table with 3 columns: (a) Description of security or category, (b) Book value, (c) Method of valuation. Rows include Financial derivatives, Closely held equity interests, and various fund categories like Hedge Funds, Private Equity Funds, etc.

Part VIII Investments - Program Related.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11c. See Form 990, Part X, line 13.

Table with 3 columns: (a) Description of investment, (b) Book value, (c) Method of valuation. Rows are numbered (1) through (9).

Part IX Other Assets.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11d. See Form 990, Part X, line 15.

Table with 2 columns: (a) Description, (b) Book value. Rows are numbered (1) through (9).

Part X Other Liabilities.

Complete if the organization answered "Yes" on Form 990, Part IV, line 11e or 11f. See Form 990, Part X, line 25.

Table with 2 columns: (a) Description of liability, (b) Book value. Row 1 includes Federal income taxes. Rows are numbered 1 through 9.

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. [X]

**Part XI Reconciliation of Revenue per Audited Financial Statements With Revenue per Return.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

1	Total revenue, gains, and other support per audited financial statements . . . . .		1	
2	Amounts included on line 1 but not on Form 990, Part VIII, line 12:			
a	Net unrealized gains (losses) on investments . . . . .	2a		
b	Donated services and use of facilities . . . . .	2b		
c	Recoveries of prior year grants . . . . .	2c		
d	Other (Describe in Part XIII.) . . . . .	2d		
e	Add lines 2a through 2d . . . . .		2e	
3	Subtract line 2e from line 1 . . . . .		3	
4	Amounts included on Form 990, Part VIII, line 12, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b . . . . .	4a		
b	Other (Describe in Part XIII.) . . . . .	4b		
c	Add lines 4a and 4b . . . . .		4c	
5	Total revenue. Add lines 3 and 4c. (This must equal Form 990, Part I, line 12.) . . . . .		5	

**Part XII Reconciliation of Expenses per Audited Financial Statements With Expenses per Return.**

Complete if the organization answered "Yes" on Form 990, Part IV, line 12a.

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:			
a	Donated services and use of facilities . . . . .	2a		
b	Prior year adjustments . . . . .	2b		
c	Other losses . . . . .	2c		
d	Other (Describe in Part XIII.) . . . . .	2d		
e	Add lines 2a through 2d . . . . .		2e	
3	Subtract line 2e from line 1 . . . . .		3	
4	Amounts included on Form 990, Part IX, line 25, but not on line 1:			
a	Investment expenses not included on Form 990, Part VIII, line 7b . . . . .	4a		
b	Other (Describe in Part XIII.) . . . . .	4b		
c	Add lines 4a and 4b . . . . .		4c	
5	Total expenses. Add lines 3 and 4c. (This must equal Form 990, Part I, line 18.) . . . . .		5	

**Part XIII Supplemental Information.**

Provide the descriptions required for Part II, lines 3, 5, and 9; Part III, lines 1a and 4; Part IV, lines 1b and 2b; Part V, line 4; Part X, line 2; Part XI, lines 2d and 4b; and Part XII, lines 2d and 4b. Also complete this part to provide any additional information.

SEE SUPPLEMENTAL PAGE

**Part XIII** Supplemental Information (continued)

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.



**Part XIII** Supplemental Information (continued)

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

**Part XIII** Supplemental Information (continued)

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

**Part XIII Supplemental Information** (continued)

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

**Part XIII** Supplemental Information *(continued)*

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**

OMB No. 1545-0047

**2022**

**Open to Public Inspection**

Department of the Treasury  
Internal Revenue Service

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

Attach to Form 990.

Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for instructions and the latest information.

Name of the organization

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

**Part I** **General Information on Activities Outside the United States.** Complete if the organization answered "Yes" on Form 990, Part IV, line 14b.

**1 For grantmakers.** Does the organization maintain records to substantiate the amount of its grants and other assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance?  Yes  No

**2 For grantmakers.** Describe in Part V the organization's procedures for monitoring the use of its grants and other assistance outside the United States.

**3 Activities per Region.** (The following Part I, line 3 table can be duplicated if additional space 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)					
<b>3a</b> Subtotal . . . . .	NONE	NONE			205,244,556.
<b>b</b> Total from continuation sheets to Part I . . . . .					
<b>c Totals</b> (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

JSA  
2E1274 1.000

**PUBLIC INSPECTION COPY**

**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.

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)									

2 Enter total number of recipient organizations listed above that are recognized as charities by the foreign country, recognized as a tax exempt 501(c)(3) organization by the IRS, or for which the grantee or counsel has provided a section 501(c)(3) equivalency letter . . . ▶ \_\_\_\_\_

3 Enter total number of other organizations or entities . . . . . ▶ \_\_\_\_\_

**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)							
(7)							
(8)							
(9)							
(10)							
(11)							
(12)							
(13)							
(14)							
(15)							
(16)							
(17)							
(18)							

Part IV Foreign Forms

- 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)* . . . . .  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  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  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)* . . . . .  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)* . . . . .  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  No



**SCHEDULE G  
(Form 990)**

**Supplemental Information Regarding Fundraising or Gaming Activities**

OMB No. 1545-0047

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.

**2022**

Department of the Treasury  
Internal Revenue Service

Attach to Form 990 or Form 990-EZ.

**Open to Public  
Inspection**

Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for instructions and the latest information.

Name of the organization

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

**Part I 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.

1 Indicate whether the organization raised funds through any of the following activities. Check all that apply.

- a  Mail solicitations
- b  Internet and email solicitations
- c  Phone solicitations
- d  In-person solicitations
- e  Solicitation of non-government grants
- f  Solicitation of government grants
- g  Special fundraising events

- 2a 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  No
- 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.

(i) Name and address of individual or entity (fundraiser)	(ii) Activity	(iii) Did fundraiser have custody or control of contributions?		(iv) Gross receipts from activity	(v) Amount paid to (or retained by) fundraiser listed in col. (i)	(vi) Amount paid to (or retained by) organization
		Yes	No			
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
<b>Total</b> .....						

3 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,

Part II Fundraising Events. Complete if the organization answered "Yes" on Form 990, Part IV, line 18, or reported more than \$15,000 of fundraising event contributions and gross income on Form 990-EZ, lines 1 and 6b. List events with gross receipts greater than \$5,000.

Table with 5 columns: Revenue, Direct Expenses, (a) Event #1 WINE AUCTION, (b) Event #2 DRISKELL DINNER, (c) Other events, (d) Total events. Rows include Gross receipts, Less: Contributions, Gross income, Cash prizes, Noncash prizes, Rent/facility costs, Food and beverages, Entertainment, Other direct expenses, and summary rows for Direct expense and Net income.

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

Table with 5 columns: Revenue, Direct Expenses, (a) Bingo, (b) Pull tabs/instant bingo/progressive bingo, (c) Other gaming, (d) Total gaming. Rows include Gross revenue, Cash prizes, Noncash prizes, Rent/facility costs, Other direct expenses, Volunteer labor, Direct expense summary, and Net gaming income summary.

9 Enter the state(s) in which the organization conducts gaming activities:
a Is the organization licensed to conduct gaming activities in each of these states?
b If "No," explain:

10a Were any of the organization's gaming licenses revoked, suspended, or terminated during the tax year?
b If "Yes," explain:



- 11 Does the organization conduct gaming activities with nonmembers?  Yes  No
- 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?  Yes  No
- 13 Indicate the percentage of gaming activity conducted in:
 

a The organization's facility	<b>13a</b>	%
b An outside facility	<b>13b</b>	%

14 Enter the name and address of the person who prepares the organization's gaming/special events books and records:

Name ▶ \_\_\_\_\_

Address ▶ \_\_\_\_\_

- 15 a Does the organization have a contract with a third party from whom the organization receives gaming revenue?  Yes  No
- b If "Yes," enter the amount of gaming revenue received by the organization ▶ \$ \_\_\_\_\_ and the amount of gaming revenue retained by the third party ▶ \$ \_\_\_\_\_.
- c If "Yes," enter name and address of the third party:
 

Name ▶ \_\_\_\_\_

Address ▶ \_\_\_\_\_

16 Gaming manager information:

Name ▶ \_\_\_\_\_

Gaming manager compensation ▶ \$ \_\_\_\_\_

Description of services provided ▶ \_\_\_\_\_

Director/officer       Employee       Independent contractor

- 17 Mandatory distributions:
  - a Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license?  Yes  No
  - b Enter the amount of distributions required under state law to be distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year ▶ \$ \_\_\_\_\_

**Part IV Supplemental Information.** Provide the explanation required by Part I, line 2b, columns (iii) and (v), and Part III, lines 9, 9b, 10b, 15b, 15c, 16, and 17b, as applicable. Also provide any additional information (see instructions).

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**SCHEDULE J  
(Form 990)**

Department of the Treasury  
Internal Revenue Service

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

**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.  
Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for instructions and the latest information.

OMB No. 1545-0047

**2022**

**Open to Public  
Inspection**

Employer identification number

58-0633971

**Part I Questions Regarding Compensation**

**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.

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> First-class or charter travel  | <input type="checkbox"/> Housing allowance or residence for personal use              |
| <input checked="" type="checkbox"/> Travel for companions          | <input type="checkbox"/> Payments for business use of personal residence              |
| <input type="checkbox"/> Tax indemnification and gross-up payments | <input checked="" type="checkbox"/> Health or social club dues or initiation fees     |
| <input type="checkbox"/> Discretionary spending account            | <input checked="" type="checkbox"/> 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 explain

**2** 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 1a?

**3** 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.

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Compensation committee              | <input checked="" type="checkbox"/> Written employment contract                     |
| <input checked="" type="checkbox"/> Independent compensation consultant | <input checked="" type="checkbox"/> Compensation survey or study                    |
| <input checked="" type="checkbox"/> Form 990 of other organizations     | <input checked="" type="checkbox"/> Approval by the board or compensation committee |

**4** 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:

- a** Receive a severance payment or change-of-control payment?
- b** Participate in or receive payment from a supplemental nonqualified retirement plan?
- c** Participate in or receive payment from an equity-based compensation arrangement?
- 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.**

**5** 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:

- a** The organization?
- b** Any related organization?
- If "Yes" on line 5a or 5b, describe in Part III.

**6** 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:

- a** The organization?
- b** Any related organization?
- If "Yes" on line 6a or 6b, describe in Part III.

**7** 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

**8** 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 in Part III

**9** If "Yes" on line 8, did the organization also follow the rebuttable presumption procedure described in Regulations section 53.4958-6(c)?

	Yes	No
<b>1b</b>	X	
<b>2</b>	X	
<b>4a</b>	X	
<b>4b</b>	X	
<b>4c</b>		X
<b>5a</b>		X
<b>5b</b>		X
<b>6a</b>		X
<b>6b</b>		X
<b>7</b>	X	
<b>8</b>		X
<b>9</b>		

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

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.

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

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

**Part III 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)**

Department of the Treasury  
Internal Revenue Service

**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.

Go to [www.irs.gov/Form990](http://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 Bond Issues**

(a) Issuer name	(b) Issuer EIN	(c) CUSIP #	(d) Date issued	(e) Issue price	(f) Description of purpose	(g) Defeased		(h) On behalf of issuer		(i) Pooled financing	
						Yes	No	Yes	No	Yes	No
<b>A</b> DEVELOPMENT AUTHORITIES OF FULTON AND DEKALB	58-1639487		09/24/2009	196,035,351.	REFUND 2/1/02, 4/28/04, 1/16/08		X		X		X
<b>B</b> DEVELOPMENT AUTHORITIES OF FULTON CO.	58-1639487		12/30/2015	43,710,329.	REFUND 9/24/2009		X		X		X
<b>C</b> DEVELOPMENT AUTHORITIES OF FULTON CO.	58-1639487		01/10/2019	55,334,175.	REFUND A PORTION OF 9/24/2009		X		X		X
<b>D</b>											

**Part II Proceeds**

	A		B		C		D	
<b>1</b> Amount of bonds retired . . . . .	146,455,351.							
<b>2</b> Amount of bonds legally defeased . . . . .								
<b>3</b> Total proceeds of issue . . . . .	196,035,351.		43,710,329.		55,334,175.			
<b>4</b> Gross proceeds in reserve funds . . . . .								
<b>5</b> Capitalized interest from proceeds . . . . .								
<b>6</b> Proceeds in refunding escrows . . . . .								
<b>7</b> Issuance costs from proceeds . . . . .	2,040,700.		519,194.		539,612.			
<b>8</b> Credit enhancement from proceeds . . . . .	271,651.							
<b>9</b> Working capital expenditures from proceeds . . . . .								
<b>10</b> Capital expenditures from proceeds . . . . .								
<b>11</b> Other spent proceeds . . . . .	188,631,750.		43,191,135.		54,794,563.			
<b>12</b> Other unspent proceeds . . . . .								
<b>13</b> Year of substantial completion . . . . .								
	Yes	No	Yes	No	Yes	No	Yes	No
<b>14</b> Were the bonds issued as part of a refunding issue of tax-exempt bonds (or, if issued prior to 2018, a current refunding issue)? . . . . .	X		X		X			
<b>15</b> Were the bonds issued as part of a refunding issue of taxable bonds (or, if issued prior to 2018, an advance refunding issue)? . . . . .		X		X		X		
<b>16</b> Has the final allocation of proceeds been made? . . . . .	X		X		X			
<b>17</b> Does the organization maintain adequate books and records to support the final allocation of proceeds? . . . . .	X		X		X			

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

Schedule K (Form 990) 2022



**Part III Private Business Use**

ROBERT W. WOODRUFF ARTS CENTER

	A		B		C		D	
	Yes	No	Yes	No	Yes	No	Yes	No
<b>1</b> Was the organization a partner in a partnership, or a member of an LLC, which owned property financed by tax-exempt bonds? . . . . .		X		X		X		
<b>2</b> Are there any lease arrangements that may result in private business use of bond-financed property? . . . . .		X		X		X		
<b>3a</b> Are there any management or service contracts that may result in private business use of bond-financed property? . . . . .		X		X		X		
<b>b</b> If "Yes" to line 3a, does the organization routinely engage bond counsel or other outside counsel to review any management or service contracts relating to the financed property? . . . . .								
<b>c</b> Are there any research agreements that may result in private business use of bond-financed property? . . . . .		X		X		X		
<b>d</b> 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? . . . . .								
<b>4</b> Enter the percentage of financed property used in a private business use by entities other than a section 501(c)(3) organization or a state or local government . . . . .								
<b>5</b> Enter the percentage of financed property used in a private business use as a result of unrelated trade or business activity carried on by your organization, another section 501(c)(3) organization, or a state or local government . . . . .		2.0300 %		2.0300 %		2.0300 %		
<b>6</b> Total of lines 4 and 5 . . . . .		2.0300 %		2.0300 %		2.0300 %		
<b>7</b> Does the bond issue meet the private security or payment test? . . . . .		X		X		X		
<b>8a</b> 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? . . . . .	X		X		X			
<b>b</b> If "Yes" to line 8a, enter the percentage of bond-financed property sold or disposed of . . . . .		7.8644 %						
<b>c</b> If "Yes" to line 8a, was any remedial action taken pursuant to Regulations sections 1.141-12 and 1.145-2? . . . . .	X			X		X		
<b>9</b> Has the organization established written procedures to ensure that all nonqualified bonds of the issue are remediated in accordance with the requirements under Regulations sections 1.141-12 and 1.145-2? . . . . .	X		X		X			

**Part IV Arbitrage**

	A		B		C		D	
	Yes	No	Yes	No	Yes	No	Yes	No
<b>1</b> Has the issuer filed Form 8038-T, Arbitrage Rebate, Yield Reduction and Penalty in Lieu of Arbitrage Rebate? . . . . .		X		X		X		
<b>2</b> If "No" to line 1, did the following apply?								
<b>a</b> Rebate not due yet? . . . . .		X		X		X		
<b>b</b> Exception to rebate? . . . . .		X	X		X			
<b>c</b> No rebate due? . . . . .		X		X		X		
If "Yes" to line 2c, provide in Part VI the date the rebate computation was performed . . . . .								
<b>3</b> Is the bond issue a variable rate issue? . . . . .	X			X		X		

ROBERT W. WOODRUFF ARTS CENTER

Part IV Arbitrage (continued)

	A		B		C		D	
	Yes	No	Yes	No	Yes	No	Yes	No
4a Has the organization or the governmental issuer entered into a qualified hedge with respect to the bond issue? . . . . .		X		X		X		
b Name of provider . . . . .								
c Term of hedge. . . . .								
d Was the hedge superintegrated? . . . . .								
e Was the hedge terminated? . . . . .								
5a Were gross proceeds invested in a guaranteed investment contract (GIC)? . . . . .		X		X		X		
b Name of provider . . . . .								
c Term of GIC . . . . .								
d Was the regulatory safe harbor for establishing the fair market value of the GIC satisfied? . . . . .								
6 Were any gross proceeds invested beyond an available temporary period? . . . . .		X		X		X		
7 Has the organization established written procedures to monitor the requirements of section 148? . . . . .	X		X		X			

Part V Procedures To Undertake Corrective Action

	A		B		C		D	
	Yes	No	Yes	No	Yes	No	Yes	No
Has the organization established written procedures to ensure that violations of federal tax requirements are timely identified and corrected through the voluntary closing agreement program if self-remediation isn't available under applicable regulations? . . . . .		X		X		X		

Part VI Supplemental Information. Provide additional information for responses to questions on Schedule K. See instructions.

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**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)**

Department of the Treasury  
Internal Revenue Service

**Noncash Contributions**

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

Attach to Form 990.

Go to [www.irs.gov/Form990](http://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 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 1g	(d) Method of determining noncash contribution amounts
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 . . . . .	X	78	11,440,456.	STOCK QUOTE
10 Securities - Closely held stock . . . . .				
11 Securities - Partnership, LLC, or trust interests . . . . .				
12 Securities - Miscellaneous . . . . .				
13 Qualified conservation 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.	
26 Other ▶ ( ) . . . . .				
27 Other ▶ ( ) . . . . .				
28 Other ▶ ( ) . . . . .				

29 Number of Forms 8283 received by the organization during the tax year for contributions for which the organization completed Form 8283, Part V, Donee Acknowledgement . . . . . **29** 23

	Yes	No
30a During the year, did the organization receive by contribution any property reported in Part I, lines 1 through 28, that it must hold for at least three years from the date of the initial contribution, and which isn't required to be used for exempt purposes for the entire holding period? . . . . .		X
b If "Yes," describe the arrangement in Part II.		
31 Does the organization have a gift acceptance policy that requires the review of any nonstandard contributions? . . . . .	X	
32a Does the organization hire or use third parties or related organizations to solicit, process, or sell noncash contributions? . . . . .	X	
b If "Yes," describe in Part II.		
33 If the organization didn't report an amount in column (c) for a type of property for which column (a) is checked, describe in Part II.		

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

Schedule M (Form 990) 2022

JSA

2E1298 1.000

3370FZ 9242 04/10/2024 11:02:42 V22-7.11 81506

**PUBLIC INSPECTION COPY**

**Part II** **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 ORGANIZATION 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.

**Part II 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 - OTHER NONCASH CONTRIBUTIONS

DESCRIPTION	(A) CHECK	(B) NUMBER OF CONTRIBUTIONS	(C) REVENUES REPORTED	(D) METHOD OF DETERMINING
FOOD & BEVERAGE	X	8	93,112.	FMV
MUSICAL INSTRUM	X	1	45,202.	FMV
FURNITURE	X	2	25,992.	FMV
TOTALS		11.	164,306.	

**SCHEDULE O  
(Form 990 or 990-EZ)**

Department of the Treasury  
Internal Revenue Service

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

**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.

▶ Information about Schedule O (Form 990 or 990-EZ) and its instructions is at [www.irs.gov/form990](http://www.irs.gov/form990).

OMB No. 1545-0047

**2022**

**Open to Public  
Inspection**

Employer identification number

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)**

Department of the Treasury  
Internal Revenue Service

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

**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.

▶ Information about Schedule O (Form 990 or 990-EZ) and its instructions is at [www.irs.gov/form990](http://www.irs.gov/form990).

OMB No. 1545-0047

**2022**

**Open to Public  
Inspection**

Employer identification number

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)**

Department of the Treasury  
Internal Revenue Service

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

**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.

▶ Information about Schedule O (Form 990 or 990-EZ) and its instructions is at [www.irs.gov/form990](http://www.irs.gov/form990).

OMB No. 1545-0047

**2022**

**Open to Public  
Inspection**

Employer identification number

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**

OMB No. 1545-0047

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.

**2022**

**Open to Public  
Inspection**

Department of the Treasury  
Internal Revenue Service

▶ Information about Schedule O (Form 990 or 990-EZ) and its instructions is at [www.irs.gov/form990](http://www.irs.gov/form990).

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

Employer identification number

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

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

FORM 990, PART III - PROGRAM SERVICE  
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LINE 4B, PROGRAM SERVICE  
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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

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

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 HIGHEST 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

Employer identification number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

FORM 990, PART X - INVESTMENTS - PUBLICLY TRADED SECURITIES

=====

DESCRIPTION	BEGINNING BOOK VALUE	ENDING BOOK VALUE	COST 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)**

Department of the Treasury  
Internal Revenue Service

Name of the organization

ROBERT W. WOODRUFF ARTS CENTER, INC.

**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.

Go to [www.irs.gov/Form990](http://www.irs.gov/Form990) for instructions and the latest information.

OMB No. 1545-0047

**2022**

**Open to Public  
Inspection**

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 applicable) of disregarded entity	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Total income	(e) End-of-year assets	(f) Direct controlling entity
(1) ASO PRODUCTIONS, LLC 85-3846658 1280 PEACHTREE ST NE ATLANTA, GA 30309	INVESTMENT	GA	NONE	NONE	WOODRUFF ART
(2) ALLIANCE THEATRE PRODUCTIONS, LLC 85-4027099 1280 PEACHTREE ST NE ATLANTA, GA 30309	INVESTMENT	GA	NONE	NONE	WOODRUFF ART
(3)					
(4)					
(5)					
(6)					

**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	(g) Section 512(b)(13) controlled entity?	
						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		x
(2)							
(3)							
(4)							
(5)							
(6)							
(7)							

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	(h) Disproportionate allocations?		(i) Code V - UBI amount in box 20 of Schedule K-1 (Form 1065)	(j) General or managing partner?		(k) Percentage ownership
							Yes	No		Yes	No	
(1)												
(2)												
(3)												
(4)												
(5)												
(6)												
(7)												

**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.

(a) Name, address, and EIN of related organization	(b) Primary activity	(c) Legal domicile (state or foreign country)	(d) Direct controlling entity	(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	(i) Section 512(b)(13) controlled entity?	
								Yes	No
(1) E P MCBURNEY TRUST 303 PEACHTREE ST ATLANTA, GA 30308 58-6029235	TRUST-INVESTING	GA	TRUIST	TRUST		7,981,994.			X
(2) E P MCBURNEY TRUST 303 PEACHTREE STREET ATLANTA, GA 30308 58-6029260	TRUST-INVESTING	GA	TRUIST	TRUST		1,299,580.			X
(3) LUCY CLAIR HARRIS TRUST ONE WEST 4TH ST WINSTON-SALEM, NC 27101 58-6163824	TRUST-INVESTING	GA	WELLS FARGO	TRUST		159,926.			X
(4) CHARITABLE REMAINDER TRUST (4) 99-9999999	TRUST INVESTING	GA	VARIOUS	TRUST					X
(5)									
(6)									
(7)									

**Part V Transactions With Related Organizations.** Complete if the organization answered "Yes" on Form 990, Part IV, line 34, 35b, or 36.

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

	Yes	No
<b>1</b> During the tax year, did the organization engage in any of the following transactions with one or more related organizations listed in Parts II-IV?		
<b>a</b> Receipt of (i) interest, (ii) annuities, (iii) royalties, or (iv) rent from a controlled entity.		X
<b>b</b> Gift, grant, or capital contribution to related organization(s)		X
<b>c</b> Gift, grant, or capital contribution from related organization(s)		X
<b>d</b> Loans or loan guarantees to or for related organization(s)		X
<b>e</b> Loans or loan guarantees by related organization(s)		X
<b>f</b> Dividends from related organization(s)		X
<b>g</b> Sale of assets to related organization(s)		X
<b>h</b> Purchase of assets from related organization(s)		X
<b>i</b> Exchange of assets with related organization(s)		X
<b>j</b> Lease of facilities, equipment, or other assets to related organization(s)		X
<b>k</b> Lease of facilities, equipment, or other assets from related organization(s)		X
<b>l</b> Performance of services or membership or fundraising solicitations for related organization(s)		X
<b>m</b> Performance of services or membership or fundraising solicitations by related organization(s)		X
<b>n</b> Sharing of facilities, equipment, mailing lists, or other assets with related organization(s)		X
<b>o</b> Sharing of paid employees with related organization(s)		X
<b>p</b> Reimbursement paid to related organization(s) for expenses.		X
<b>q</b> Reimbursement paid by related organization(s) for expenses		X
<b>r</b> Other transfer of cash or property to related organization(s)		X
<b>s</b> Other transfer of cash or property from related organization(s)		X

**2** If the answer to any of the above is "Yes," see the instructions for information on who must complete this line, including covered relationships and transaction thresholds.

	(a) Name of related organization	(b) Transaction type (a - s)	(c) Amount involved	(d) Method of determining amount involved
(1)				
(2)				
(3)				
(4)				
(5)				
(6)				

**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)	(d) Predominant income (related, unrelated, excluded from tax under sections 512 - 514)	(e) Are all partners section 501(c)(3) organizations?		(f) Share of total income	(g) Share of end-of-year assets	(h) Disproportionate allocations?		(i) Code V - UBI amount in box 20 of Schedule K-1 (Form 1065)	(j) General or managing partner?		(k) Percentage ownership
				Yes	No			Yes	No		Yes	No	
(1)													
(2)													
(3)													
(4)													
(5)													
(6)													
(7)													
(8)													
(9)													
(10)													
(11)													
(12)													
(13)													
(14)													
(15)													
(16)													

**Part VII** Supplemental Information

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

# RENT AND ROYALTY INCOME

<b>Taxpayer's Name</b> ROBERT W. WOODRUFF ARTS CENTER, INC.	<b>Identifying Number</b> 58-0633971
--	---

**DESCRIPTION OF PROPERTY**

PROPERTY

Yes	No	Did you actively participate in the operation of the activity during the tax year?
-----	----	--

**TYPE OF PROPERTY:**

<b>OTHER INCOME:</b>		
<b>TOTAL GROSS INCOME</b>		

**OTHER EXPENSES:**


<b>DEPRECIATION (SHOWN BELOW)</b>	51,295.	
<b>LESS: Beneficiary's Portion</b>		
<b>AMORTIZATION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>DEPLETION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>TOTAL EXPENSES</b>		51,295.
<b>TOTAL RENT OR ROYALTY INCOME (LOSS)</b>		-51,295.

**Less Amount to**

Rent or Royalty		
Depreciation		
Depletion		
Investment Interest Expense		
Other Expenses		
<b>Net Income (Loss) to Others</b>		
<b>Net Rent or Royalty Income (Loss)</b>		-51,295.

**Deductible Rental Loss (if Applicable)**

**SCHEDULE FOR DEPRECIATION CLAIMED**

(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									
<b>Totals</b>									51,295.

# RENT AND ROYALTY INCOME

Taxpayer's Name <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	Identifying Number <b>58-0633971</b>
--	---

DESCRIPTION OF PROPERTY  
**PARKING LOTS AND GARAGES**

Yes	No	Did you actively participate in the operation of the activity during the tax year?
-----	----	--

TYPE OF PROPERTY:

---

OTHER INCOME:

---

**TOTAL GROSS INCOME** .....

OTHER EXPENSES:

---



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DEPRECIATION (SHOWN BELOW) .....	7,806.	
LESS: Beneficiary's Portion .....		
AMORTIZATION .....		
LESS: Beneficiary's Portion .....		
DEPLETION .....		
LESS: Beneficiary's Portion .....		
<b>TOTAL EXPENSES</b> .....		7,806.
<b>TOTAL RENT OR ROYALTY INCOME (LOSS)</b> .....		<b>-7,806.</b>

Less Amount to

Rent or Royalty .....

Depreciation .....

Depletion .....

Investment Interest Expense .....

Other Expenses .....

Net Income (Loss) to Others .....

**Net Rent or Royalty Income (Loss)** .....

**-7,806.**

Deductible Rental Loss (if Applicable) .....

**SCHEDULE FOR DEPRECIATION CLAIMED**

(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									
<b>Totals</b> .....									7,806.

# RENT AND ROYALTY INCOME

<b>Taxpayer's Name</b> ROBERT W. WOODRUFF ARTS CENTER, INC.	<b>Identifying Number</b> 58-0633971
--	---

**DESCRIPTION OF PROPERTY**  
 GIFT SHOP

Yes	No	Did you actively participate in the operation of the activity during the tax year?
-----	----	--

<b>TYPE OF PROPERTY:</b>		
<b>OTHER INCOME:</b>		
<b>TOTAL GROSS INCOME</b>		
<b>OTHER EXPENSES:</b>		
<b>DEPRECIATION (SHOWN BELOW)</b>		20,796.
<b>LESS: Beneficiary's Portion</b>		
<b>AMORTIZATION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>DEPLETION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>TOTAL EXPENSES</b>		20,796.
<b>TOTAL RENT OR ROYALTY INCOME (LOSS)</b>		-20,796.

**Less Amount to**

Rent or Royalty	
Depreciation	
Depletion	
Investment Interest Expense	
Other Expenses	
<b>Net Income (Loss) to Others</b>	
<b>Net Rent or Royalty Income (Loss)</b>	-20,796.

**Deductible Rental Loss (if Applicable)**

**SCHEDULE FOR DEPRECIATION CLAIMED**

(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									
<b>Totals</b>									20,796.

# RENT AND ROYALTY INCOME

<b>Taxpayer's Name</b> ROBERT W. WOODRUFF ARTS CENTER, INC.	<b>Identifying Number</b> 58-0633971
--	---

**DESCRIPTION OF PROPERTY**  
 LESSOR OF NONRESIDENTIAL BUILDING

Yes	No	Did you actively participate in the operation of the activity during the tax year?
-----	----	--

**TYPE OF PROPERTY:**

**OTHER INCOME:**


**TOTAL GROSS INCOME**

**OTHER EXPENSES:**


<b>DEPRECIATION (SHOWN BELOW)</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>AMORTIZATION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>DEPLETION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>TOTAL EXPENSES</b>		
<b>TOTAL RENT OR ROYALTY INCOME (LOSS)</b>		

**Less Amount to**

Rent or Royalty		
Depreciation		
Depletion		
Investment Interest Expense		
Other Expenses		
<b>Net Income (Loss) to Others</b>		
<b>Net Rent or Royalty Income (Loss)</b>		
<b>Deductible Rental Loss (if Applicable)</b>		

**SCHEDULE FOR DEPRECIATION CLAIMED**

(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
<b>Totals</b>									



# RENT AND ROYALTY INCOME

<b>Taxpayer's Name</b> ROBERT W. WOODRUFF ARTS CENTER, INC.	<b>Identifying Number</b> 58-0633971
--	---

**DESCRIPTION OF PROPERTY**  
 EVENTS AND CATERING

Yes	No	Did you actively participate in the operation of the activity during the tax year?
-----	----	--

**TYPE OF PROPERTY:**

<b>OTHER INCOME:</b>		
<b>TOTAL GROSS INCOME</b>		

<b>OTHER EXPENSES:</b>		

<b>DEPRECIATION (SHOWN BELOW)</b>	83,539.	
<b>LESS: Beneficiary's Portion</b>		
<b>AMORTIZATION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>DEPLETION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>TOTAL EXPENSES</b>		83,539.
<b>TOTAL RENT OR ROYALTY INCOME (LOSS)</b>		-83,539.

**Less Amount to**

Rent or Royalty		
Depreciation		
Depletion		
Investment Interest Expense		
Other Expenses		
<b>Net Income (Loss) to Others</b>		
<b>Net Rent or Royalty Income (Loss)</b>		-83,539.

**Deductible Rental Loss (if Applicable)**

**SCHEDULE FOR DEPRECIATION CLAIMED**

(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									
<b>Totals</b>									83,539.

# RENT AND ROYALTY INCOME

<b>Taxpayer's Name</b> ROBERT W. WOODRUFF ARTS CENTER, INC.	<b>Identifying Number</b> 58-0633971
--	---

**DESCRIPTION OF PROPERTY**

Yes	No	Did you actively participate in the operation of the activity during the tax year?
-----	----	--

<b>TYPE OF PROPERTY:</b>		
<b>OTHER INCOME:</b>		
<b>TOTAL GROSS INCOME</b>		
<b>OTHER EXPENSES:</b>		
<b>DEPRECIATION (SHOWN BELOW)</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>AMORTIZATION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>DEPLETION</b>		
<b>LESS: Beneficiary's Portion</b>		
<b>TOTAL EXPENSES</b>		
<b>TOTAL RENT OR ROYALTY INCOME (LOSS)</b>		

**Less Amount to**

Rent or Royalty		
Depreciation		
Depletion		
Investment Interest Expense		
Other Expenses		
<b>Net Income (Loss) to Others</b>		
<b>Net Rent or Royalty Income (Loss)</b>		
<b>Deductible Rental Loss (if Applicable)</b>		

**SCHEDULE FOR DEPRECIATION CLAIMED**

(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
<b>Totals</b>									

RENT AND ROYALTY SUMMARY  
=====

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

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

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

TOTAL OTHER DEDUCTIONS .....	----- 1,202,844. =====
------------------------------	------------------------------

Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

ROBERT W. WOODRUFF ARTS CENTER, INC.

Identifying number

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.

Table with 5 main rows for general depreciation calculations and a table for listed property with columns (a) Description, (b) Cost, and (c) Elected cost.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table with 3 rows for special depreciation allowance and other depreciation.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table with 2 rows for MACRS deductions for assets placed in service in tax years beginning before 2022.

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

Table with 7 columns: (a) Classification, (b) Month and year placed in service, (c) Basis, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table with 4 rows for alternative depreciation system class life and recovery periods.

Part IV Summary (See instructions.)

Table with 3 rows for summary of depreciation amounts.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes No 24b If "Yes," is the evidence written? Yes No

Table with 9 columns: (a) Type of property, (b) Date placed in service, (c) Business/investment use percentage, (d) Cost or other basis, (e) Basis for depreciation, (f) Recovery period, (g) Method/Convention, (h) Depreciation deduction, (i) Elected section 179 cost.

25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions 25

26 Property used more than 50% in a qualified business use: %

27 Property used 50% or less in a qualified business use: % S/L -

28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1. 28

29 Add amounts in column (i), line 26. Enter here and on line 7, page 1. 29

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

Table with 6 columns: (a) Vehicle 1, (b) Vehicle 2, (c) Vehicle 3, (d) Vehicle 4, (e) Vehicle 5, (f) Vehicle 6. Rows 30-36 include questions about miles driven and personal use.

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

Table with 2 columns: Yes, No. Rows 37-41 include questions about written policy statements and requirements for qualified automobile demonstration use.

Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.

Part VI Amortization

Table with 6 columns: (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 during your 2022 tax year (see instructions):

Table with 6 columns: (a) Description of costs, (b) Date amortization begins, (c) Amortizable amount, (d) Code section, (e) Amortization period or percentage, (f) Amortization for this year.

43 Amortization of costs that began before your 2022 tax year. 43

44 Total. Add amounts in column (f). See the instructions for where to report 44

Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

ROBERT W. WOODRUFF ARTS CENTER, 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.

Table with 5 columns: Line number, Description, (b) Cost, (c) Elected cost, and Amount. Includes lines 1-13 for property election details.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table with 3 columns: Line number, Description, and Amount. Includes lines 14-16 for special depreciation allowance.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table with 3 columns: Line number, Description, and Amount. Includes lines 17-18 for MACRS deductions.

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

Table with 7 columns: (a) Classification, (b) Month and year, (c) Basis, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Includes rows 19a-i for various property types.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table with 7 columns: Line number, Description, (b) Month and year, (c) Basis, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Includes rows 20a-d for class life.

Part IV Summary (See instructions.)

Table with 3 columns: Line number, Description, and Amount. Includes lines 21-23 for summary totals.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes X No 24b If "Yes," is the evidence written? Yes X No

Table with columns (a) Type of property, (b) Date placed in service, (c) Business/investment use percentage, (d) Cost or other basis, (e) Basis for depreciation, (f) Recovery period, (g) Method/Convention, (h) Depreciation deduction, (i) Elected section 179 cost.

25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions 25

26 Property used more than 50% in a qualified business use: %

27 Property used 50% or less in a qualified business use: % S/L -

28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1. 28

29 Add amounts in column (i), line 26. Enter here and on line 7, page 1. 29

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

Table for Section B with columns (a) through (f) for Vehicle 1 through Vehicle 6, and rows 30-36 for miles driven and availability questions.

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

Table for Section C with rows 37-41 and columns Yes/No for policy and use questions.

Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.

Part VI Amortization

Table for Section C with columns (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 during your 2022 tax year (see instructions):

43 Amortization of costs that began before your 2022 tax year. 43

44 Total. Add amounts in column (f). See the instructions for where to report 44



Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

Identifying number

ROBERT W. WOODRUFF ARTS CENTER, INC.

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.

Table with 5 main rows for Part I. Line 1: Maximum amount. Line 2: Total cost of section 179 property. Line 3: Threshold cost. Line 4: Reduction in limitation. Line 5: Dollar limitation. Line 6-13: Detailed property information and calculations.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table for Part II with 3 rows: Line 14: Special depreciation allowance. Line 15: Property subject to section 168(f)(1) election. Line 16: Other depreciation (including ACRS) totaling 7,806.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table for Section A with 2 rows: Line 17: MACRS deductions for assets placed in service before 2022. Line 18: Grouping assets into general asset accounts.

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

Table for Section B with 7 columns: (a) Classification, (b) Month/year, (c) Basis, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Rows include 3-year, 5-year, 7-year, 10-year, 15-year, 20-year, 25-year, and residential/nonresidential rental properties.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table for Section C with 4 rows: Line 20a: Class life. Line 20b: 12-year. Line 20c: 30-year. Line 20d: 40-year.

Part IV Summary (See instructions.)

Table for Part IV with 3 rows: Line 21: Listed property amount. Line 22: Total amount including lines 12, 14-17, 19, 20, and 21, totaling 7,806. Line 23: Portion of basis attributable to section 263A costs.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes No 24b If "Yes," is the evidence written? Yes No

Table with 9 columns: (a) Type of property, (b) Date placed in service, (c) Business/investment use percentage, (d) Cost or other basis, (e) Basis for depreciation, (f) Recovery period, (g) Method/Convention, (h) Depreciation deduction, (i) Elected section 179 cost.

25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions 25

26 Property used more than 50% in a qualified business use: %

27 Property used 50% or less in a qualified business use: % S/L -

28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1. 28

29 Add amounts in column (i), line 26. Enter here and on line 7, page 1. 29

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

Table with 6 columns: (a) Vehicle 1, (b) Vehicle 2, (c) Vehicle 3, (d) Vehicle 4, (e) Vehicle 5, (f) Vehicle 6. Rows 30-36 include questions about miles driven and personal use.

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

Table with 2 columns: Yes, No. Rows 37-41 include questions about written policy statements and requirements for qualified automobile demonstration use.

Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.

Part VI Amortization

Table with 6 columns: (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 during your 2022 tax year (see instructions):

43 Amortization of costs that began before your 2022 tax year. 43

44 Total. Add amounts in column (f). See the instructions for where to report 44

Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

Identifying number

ROBERT W. WOODRUFF ARTS CENTER, INC.

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.

Table with 5 main rows for Part I. Row 1: Maximum amount. Row 2: Total cost of section 179 property. Row 3: Threshold cost of section 179 property. Row 4: Reduction in limitation. Row 5: Dollar limitation for tax year. Row 6: Description of property, Cost, Elected cost. Row 7: Listed property. Row 8: Total elected cost. Row 9: Tentative deduction. Row 10: Carryover of disallowed deduction. Row 11: Business income limitation. Row 12: Section 179 expense deduction. Row 13: Carryover of disallowed deduction to 2023.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table with 3 rows for Part II. Row 14: Special depreciation allowance. Row 15: Property subject to section 168(f)(1) election. Row 16: Other depreciation (including ACRS) with value 20,796.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table with 2 rows for Section A. Row 17: MACRS deductions for assets placed in service in tax years beginning before 2022. Row 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 Placed in Service During 2022 Tax Year Using the General Depreciation System

Table with 7 columns: (a) Classification of property, (b) Month and year placed in service, (c) Basis for depreciation, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Rows 19a-g: 3-year, 5-year, 7-year, 10-year, 15-year, 20-year, 25-year property. Rows 19h-i: Residential rental property, Nonresidential real property.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table with 7 columns: (a) Class life, (b) Month and year placed in service, (c) Basis for depreciation, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Rows 20a-d: 12-year, 30-year, 40-year class life.

Part IV Summary (See instructions.)

Table with 3 rows for Part IV. Row 21: Listed property. Row 22: Total. Row 23: For assets shown above and placed in service during the current year, enter the portion of the basis attributable to section 263A costs.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes No 24b If "Yes," is the evidence written? Yes No
(a) Type of property (list vehicles first) (b) Date placed in service (c) Business/investment use percentage (d) Cost or other basis (e) Basis for depreciation (business/investment use only) (f) Recovery period (g) Method/Convention (h) Depreciation deduction (i) Elected section 179 cost
25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions 25
26 Property used more than 50% in a qualified business use:
27 Property used 50% or less in a qualified business use:
28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1. 28
29 Add amounts in column (i), line 26. Enter here and on line 7, page 1. 29

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

30 Total business/investment miles driven during the year (don't include commuting miles)
31 Total commuting miles driven during the year
32 Total other personal (noncommuting) miles driven
33 Total miles driven during the year. Add lines 30 through 32
34 Was the vehicle available for personal use during off-duty hours?
35 Was the vehicle used primarily by a more than 5% owner or related person?
36 Is another vehicle available for personal use?
(a) Vehicle 1 (b) Vehicle 2 (c) Vehicle 3 (d) Vehicle 4 (e) Vehicle 5 (f) Vehicle 6

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

37 Do you maintain a written policy statement that prohibits all personal use of vehicles, including commuting, by your employees?
38 Do you maintain a written policy statement that prohibits personal use of vehicles, except commuting, by your employees? See the instructions for vehicles used by corporate officers, directors, or 1% or more owners
39 Do you treat all use of vehicles by employees as personal use?
40 Do you provide more than five vehicles to your employees, obtain information from your employees about the use of the vehicles, and retain the information received?
41 Do you meet the requirements concerning qualified automobile demonstration use? See instructions
Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.

Part VI Amortization

(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 during your 2022 tax year (see instructions):
43 Amortization of costs that began before your 2022 tax year. 43
44 Total. Add amounts in column (f). See the instructions for where to report 44

Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

Identifying number

ROBERT W. WOODRUFF ARTS CENTER, INC.

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.

Table with 5 columns: Line number, Description, (b) Cost, (c) Elected cost, and Amount. Includes lines 1-13 for property election details.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table with 2 columns: Line number and Amount. Includes lines 14-16 for special depreciation allowance.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table with 2 columns: Line number and Amount. Includes lines 17-18 for MACRS deductions.

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

Table with 7 columns: (a) Classification, (b) Month and year, (c) Basis, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Includes rows 19a-i for various property types.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table with 7 columns: Line number, Class life, (b) Month and year, (c) Basis, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Includes rows 20a-d for class life categories.

Part IV Summary (See instructions.)

Table with 2 columns: Line number and Amount. Includes lines 21-23 for summary totals.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes No 24b If "Yes," is the evidence written? Yes No
(a) Type of property (list vehicles first) (b) Date placed in service (c) Business/investment use percentage (d) Cost or other basis (e) Basis for depreciation (business/investment use only) (f) Recovery period (g) Method/Convention (h) Depreciation deduction (i) Elected section 179 cost
25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions 25
26 Property used more than 50% in a qualified business use:
27 Property used 50% or less in a qualified business use:
28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1. 28
29 Add amounts in column (i), line 26. Enter here and on line 7, page 1. 29

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

30 Total business/investment miles driven during the year (don't include commuting miles)
31 Total commuting miles driven during the year
32 Total other personal (noncommuting) miles driven
33 Total miles driven during the year. Add lines 30 through 32
34 Was the vehicle available for personal use during off-duty hours?
35 Was the vehicle used primarily by a more than 5% owner or related person?
36 Is another vehicle available for personal use?
(a) Vehicle 1 (b) Vehicle 2 (c) Vehicle 3 (d) Vehicle 4 (e) Vehicle 5 (f) Vehicle 6

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

37 Do you maintain a written policy statement that prohibits all personal use of vehicles, including commuting, by your employees?
38 Do you maintain a written policy statement that prohibits personal use of vehicles, except commuting, by your employees? See the instructions for vehicles used by corporate officers, directors, or 1% or more owners
39 Do you treat all use of vehicles by employees as personal use?
40 Do you provide more than five vehicles to your employees, obtain information from your employees about the use of the vehicles, and retain the information received?
41 Do you meet the requirements concerning qualified automobile demonstration use? See instructions
Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.

Part VI Amortization

(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 during your 2022 tax year (see instructions):
43 Amortization of costs that began before your 2022 tax year. 43
44 Total. Add amounts in column (f). See the instructions for where to report 44

Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

Identifying number 58-0633971

ROBERT W. WOODRUFF ARTS CENTER, INC.

Business or activity to which this form relates

EVENTS AND CATERING

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.

Table with 5 columns: Line number, Description, (a) Description of property, (b) Cost (business use only), (c) Elected cost. Includes lines 1-13 for Section 179 election.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table with 3 columns: Line number, Description, Amount. Includes lines 14-16 for Special Depreciation Allowance and Other Depreciation.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table with 3 columns: Line number, Description, Amount. Includes lines 17-18 for MACRS Deductions.

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

Table with 7 columns: (a) Classification of property, (b) Month and year placed in service, (c) Basis for depreciation, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Includes lines 19a-i for General Depreciation System.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table with 7 columns: Line number, Description, (b) Month and year placed in service, (c) Basis for depreciation, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction. Includes lines 20a-d for Alternative Depreciation System.

Part IV Summary (See instructions.)

Table with 3 columns: Line number, Description, Amount. Includes lines 21-23 for Summary.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes No 24b If "Yes," is the evidence written? Yes No

Table with columns (a) through (i) for depreciation and other information. Includes rows 25, 26, 27, 28, and 29.

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

Table for Section B with columns (a) through (f) for Vehicle 1 through Vehicle 6. Includes rows 30 through 36.

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

Table for Section C with columns Yes and No. Includes rows 37 through 41.

Part VI Amortization

Table for Section C with columns (a) through (f). Includes rows 42, 43, and 44.



Depreciation and Amortization (Including Information on Listed Property)

Department of the Treasury Internal Revenue Service

Attach to your tax return. Go to www.irs.gov/Form4562 for instructions and the latest information.

Attachment Sequence No. 179

Name(s) shown on return

Identifying number

ROBERT W. WOODRUFF ARTS CENTER, INC.

58-0633971

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.

Table with 5 rows for lines 1-5 and 6-13. Columns include description, cost, and elected cost.

Note: Don't use Part II or Part III below for listed property. Instead, use Part V.

Part II Special Depreciation Allowance and Other Depreciation (Don't include listed property. See instructions.)

Table with 3 rows for lines 14, 15, and 16.

Part III MACRS Depreciation (Don't include listed property. See instructions.)

Section A

Table with 2 rows for lines 17 and 18.

Section B - Assets Placed in Service During 2022 Tax Year Using the General Depreciation System

Table with 7 columns: (a) Classification of property, (b) Month and year placed in service, (c) Basis for depreciation, (d) Recovery period, (e) Convention, (f) Method, (g) Depreciation deduction.

Section C - Assets Placed in Service During 2022 Tax Year Using the Alternative Depreciation System

Table with 4 rows for lines 20a, 20b, 20c, and 20d.

Part IV Summary (See instructions.)

Table with 3 rows for lines 21, 22, and 23.

Part V Listed Property (Include automobiles, certain other vehicles, certain aircraft, and property used for entertainment, recreation, or amusement.)

Note: For any vehicle for which you are using the standard mileage rate or deducting lease expense, complete only 24a, 24b, columns (a) through (c) of Section A, all of Section B, and Section C if applicable.

Section A - Depreciation and Other Information (Caution: See the instructions for limits for passenger automobiles.)

24a Do you have evidence to support the business/investment use claimed? Yes No 24b If "Yes," is the evidence written? Yes No
(a) Type of property (list vehicles first) (b) Date placed in service (c) Business/investment use percentage (d) Cost or other basis (e) Basis for depreciation (business/investment use only) (f) Recovery period (g) Method/Convention (h) Depreciation deduction (i) Elected section 179 cost
25 Special depreciation allowance for qualified listed property placed in service during the tax year and used more than 50% in a qualified business use. See instructions 25
26 Property used more than 50% in a qualified business use:
27 Property used 50% or less in a qualified business use:
28 Add amounts in column (h), lines 25 through 27. Enter here and on line 21, page 1. 28
29 Add amounts in column (i), line 26. Enter here and on line 7, page 1. 29

Section B - Information on Use of Vehicles

Complete this section for vehicles used by a sole proprietor, partner, or other "more than 5% owner," or related person. If you provided vehicles to your employees, first answer the questions in Section C to see if you meet an exception to completing this section for those vehicles.

30 Total business/investment miles driven during the year (don't include commuting miles)
31 Total commuting miles driven during the year
32 Total other personal (noncommuting) miles driven
33 Total miles driven during the year. Add lines 30 through 32
34 Was the vehicle available for personal use during off-duty hours?
35 Was the vehicle used primarily by a more than 5% owner or related person?
36 Is another vehicle available for personal use?
(a) Vehicle 1 (b) Vehicle 2 (c) Vehicle 3 (d) Vehicle 4 (e) Vehicle 5 (f) Vehicle 6

Section C - Questions for Employers Who Provide Vehicles for Use by Their Employees

Answer these questions to determine if you meet an exception to completing Section B for vehicles used by employees who aren't more than 5% owners or related persons. See instructions.

37 Do you maintain a written policy statement that prohibits all personal use of vehicles, including commuting, by your employees?
38 Do you maintain a written policy statement that prohibits personal use of vehicles, except commuting, by your employees? See the instructions for vehicles used by corporate officers, directors, or 1% or more owners
39 Do you treat all use of vehicles by employees as personal use?
40 Do you provide more than five vehicles to your employees, obtain information from your employees about the use of the vehicles, and retain the information received?
41 Do you meet the requirements concerning qualified automobile demonstration use? See instructions
Note: If your answer to 37, 38, 39, 40, or 41 is "Yes," don't complete Section B for the covered vehicles.

Part VI Amortization

(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 during your 2022 tax year (see instructions):
43 Amortization of costs that began before your 2022 tax year. 43
44 Total. Add amounts in column (f). See the instructions for where to report 44

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR GROWTH I, LP	98-1473489

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

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

**4** Name of transferee (foreign corporation) **ALAN SA** **5a** Identifying number, if any **FOREIGNUS**

**6** Address (including country) **117 QUAI DE VALMY** **5b** Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 1], Property with built-in loss, Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? . . . . .  Yes  No
12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? . . . . .  Yes  No
If "Yes," go to line 12b.
b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No
If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.
c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? . . . . .  Yes  No
If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.
d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_
13 Did the transferor transfer property described in section 367(d)(4)? . . . . .  Yes  No
If "No," skip Section C and questions 14a through 15.

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4), Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00061 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR GROWTH I, LP	98-1473489

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

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

**4** Name of transferee (foreign corporation) **EIGEN TECH** **5a** Identifying number, if any **FOREIGNUS**

**6** Address (including country) **86 FETTER LANE** **5b** Reference ID number (see instructions)

**LONDON UK EC4A 1EN**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 04/26/2022, 4,579.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.03788 % (b) After 0.03877 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No



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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

4 Name of transferee (foreign corporation) **BELLMAN SAS** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **34 AVENUE DES CHAMPS-ELYSEES** 5b Reference ID number (see instructions)

**PARIS FR 75008**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row for Cash.

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

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

Table with 6 columns: 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. Rows for Stock and securities, Inventory, Other property (not listed under another category), Property with built-in loss, Totals.

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row for Property described in sec. 367(d)(4), Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.07512 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	Identifying number (see instructions) <b>58-0633971</b>
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- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
<b>LAKESTAR III, LP</b>	<b>98-1473139</b>

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

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

<b>4</b> Name of transferee (foreign corporation) <b>DAREWISE ENTERTAINMENT</b>	<b>5a</b> Identifying number, if any <b>FOREIGNUS</b>
<b>6</b> Address (including country) 27 RUE DE MOGADOR PARIS FR 75009	<b>5b</b> Reference ID number (see instructions)
<b>7</b> Country code of country of incorporation or organization (see instructions) <b>FR</b>	
<b>8</b> Foreign law characterization (see instructions) <b>CORPORATION</b>	
<b>9</b> Is the transferee foreign corporation a controlled foreign corporation? . . . . . <input type="checkbox"/> Yes <input checked="" type="checkbox"/> <b>No</b>	

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 3], Property with built-in loss, Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? . . . . .  Yes  No
12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? . . . . .  Yes  No
If "Yes," go to line 12b.
b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No
If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.
c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? . . . . .  Yes  No
If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.
d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_
13 Did the transferor transfer property described in section 367(d)(4)? . . . . .  Yes  No
If "No," skip Section C and questions 14a through 15.

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4), Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.05830 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

4 Name of transferee (foreign corporation) **DASHDASH GMBH** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **AM MARCHENBRUNNEN 5  
 BERLIN GM 10407** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 4], Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4), Totals



- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.08912 % (b) After 0.08130 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

4 Name of transferee (foreign corporation) **HALO PCC LIMITED** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **EAST WING, TRAFALGAR COURT** 5b Reference ID number (see instructions)

**LES BANQUES ST PETER PORT GK GY1 3PP**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 5], Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

4 Name of transferee (foreign corporation) **LIMEHOME GMBH** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **BREINNER STRABE 13/IV  
 MUNICH GM 80333** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 6], Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.06633 % (b) After 0.05969 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

4 Name of transferee (foreign corporation) **NETSPEAK GAMES LTD** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **1 GILTSPUR STREET** 5b Reference ID number (see instructions)

**LONDON UK EC1A 9DD**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.



Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 7], Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.04682 % (b) After 0.08644 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

**4** Name of transferee (foreign corporation) **STARFISH EQUITY LIMITED** **5a** Identifying number, if any **FOREIGNUS**

**6** Address (including country)  
 PO BOX 656 EAST WING, TRAFALGAR CT  
 LES BANQUES ST PETER PORT GK GY1 3PP **5b** Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 8], Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.07013 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

**4** Name of transferee (foreign corporation) **SUNSHINE SMILE GMBH** **5a** Identifying number, if any **FOREIGNUS**

**6** Address (including country) **WINDSCHEIDSTRABE 18** **5b** Reference ID number (see instructions)

**BERLIN GM 10627**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 9], Property with built-in loss, Totals

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? . . . . .  Yes  No
12a Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation? . . . . .  Yes  No
If "Yes," go to line 12b.
b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No
If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.
c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? . . . . .  Yes  No
If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.
d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_
13 Did the transferor transfer property described in section 367(d)(4)? . . . . .  Yes  No
If "No," skip Section C and questions 14a through 15.

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4), Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.05043 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No



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

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

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

Name of transferor <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	Identifying number (see instructions) <b>58-0633971</b>
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- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
<b>LAKESTAR III, LP</b>	<b>98-1473139</b>

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

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

<b>4</b> Name of transferee (foreign corporation) <b>TREESPLEASE GAMES LIMITED</b>	<b>5a</b> Identifying number, if any <b>FOREIGNUS</b>
<b>6</b> Address (including country) PRESTON PARK HOUSE, SOUTH ROAD BRIGHTON EAST SUSSEX UK BN1 6SB	<b>5b</b> Reference ID number (see instructions)
<b>7</b> Country code of country of incorporation or organization (see instructions) <b>UK</b>	
<b>8</b> Foreign law characterization (see instructions) <b>CORPORATION</b>	
<b>9</b> Is the transferee foreign corporation a controlled foreign corporation? . . . . . <input type="checkbox"/> Yes <input checked="" type="checkbox"/> <b>No</b>	

For Paperwork Reduction Act Notice, see separate instructions.

**Part III Information Regarding Transfer of Property** (see instructions)

**Section A - Cash**

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

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

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

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)	SEE STATEMENT	10			
Property with built-in loss					
Totals					

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

**12a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  Yes  No  
 If "Yes," go to line 12b.

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

**c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  Yes  No  
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

**d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_

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

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

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 Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.08382 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	Identifying number (see instructions) <b>58-0633971</b>
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- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
<b>LAKESTAR III, LP</b>	<b>98-1473139</b>

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

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

<b>4</b> Name of transferee (foreign corporation) <b>UNCAPPED LIMITED</b>	<b>5a</b> Identifying number, if any <b>FOREIGNUS</b>
<b>6</b> Address (including country) INTERNATIONAL HOUSE, 24 HOLBORN VIADUCT LONDON UK EC1A 2BN	<b>5b</b> Reference ID number (see instructions)
<b>7</b> Country code of country of incorporation or organization (see instructions) <b>UK</b>	
<b>8</b> Foreign law characterization (see instructions) <b>CORPORATION</b>	
<b>9</b> Is the transferee foreign corporation a controlled foreign corporation? . . . . . <input type="checkbox"/> Yes <input checked="" type="checkbox"/> <b>No</b>	

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities, Inventory, Other property (not listed under another category) [SEE STATEMENT 11], Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.06792 % (b) After 0.06792 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
LAKESTAR III, LP	98-1473139

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

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

4 Name of transferee (foreign corporation) **FLYING PIGS LIMITED** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **5 ALUF MOGEN KELMAN** 5b Reference ID number (see instructions)

**TEL-AVIV JAFFA IS 6107077**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 02/17/2022, 3,067.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.



- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **PTI CAYMAN HOLDCO, LP** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154** 5b Reference ID number (see instructions)

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

8 Foreign law characterization (see instructions)

**CORPORATION**

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, 8.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00079 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **STONEGATE PUB COMPANY HOLDING SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **20, RUE EUGENE RUPPERT** 5b Reference ID number (see instructions)

**LUXEMBOURG LU L-2453**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 03/21/2020, 30.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... [ ] Yes [ ] No
12b Was the transferor a domestic corporation... [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder... [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00015 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **VEPF V POLARIS BLOCKER** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **C/O MAPLES CORPORATE SERVICES LIMITED PO BOX 309 UGLAN GRAND CAYMAN CJ KY1-1104** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.



Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row for Cash.

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

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

Table with 6 columns: 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. Rows for Stock and securities, Inventory, Other property, Property with built-in loss, Totals.

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ▶ \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row for Property described in sec. 367(d)(4), Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00017 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **PHOENIX TOWER IRELAND HOLDCO LIMITED** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154** 5b Reference ID number (see instructions)

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

8 Foreign law characterization (see instructions)

**CORPORATION**

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, 13.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00079 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **LINCOLN HOLDINGS SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **20, RUE EUGENE RUPPERT B191769 LUXEMBOURG LU B190439** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 06/28/2021, 5.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00011 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No



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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **VOI TECHNOLOGY AB** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **OSTERMALMSGATAN 26**  
**STOCKHOLM SW 114 26** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/02/2022, 57.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00087 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **OPTIMA GROUP SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **20, RUE EUGENE RUPPERT**  
**LUXEMBOURG LU B190439** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 02/11/2021, 11.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... [ ] Yes [ ] No
12b Was the transferor a domestic corporation... [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder... [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4).

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00001 % (b) After 0.00001 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **GLOBAL INDUSTRIAL HOLDINGS SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154** 5b Reference ID number (see instructions)

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

8 Foreign law characterization (see instructions)

**PARTNERSHIP**

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2021, 18.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.



- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00666 % (b) After 0.00666 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor: **ROBERT W. WOODRUFF ARTS CENTER, INC.**  
 Identifying number (see instructions): **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation): **PVC EUROPE GROUP SARL**  
 5a Identifying number, if any: **FOREIGNUS**

6 Address (including country): **C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154**  
 5b Reference ID number (see instructions):

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

8 Foreign law characterization (see instructions)

**PARTNERSHIP**

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2021, 11.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00666 % (b) After 0.00666 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **STRATEGIC ASSETS GROUP SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **23, AVENUE MONTEREY** **LUXEMBOURG LU L-2163** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2021, 13.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00782 % (b) After 0.00782 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **SPECIAL PACKAGING SOLUTIONS HOLDINGS SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **23, AVENUE MONTEREY** **LUXEMBOURG LU L-2163** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.



Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2021, 72.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00719 % (b) After 0.00719 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **GLOBAL FURNITURE HOLDINGS SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **23, AVENUE MONTEREY** **LUXEMBOURG LU L-2163** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2021, 188.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00719 % (b) After 0.00719 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **BY MILES GROUP LTD** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **2-14 SHORTLANDS HAMMERSMITH** 5b Reference ID number (see instructions)

**LONDON UK W6 8DJ**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash

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

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

Table with 6 columns: 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. Rows: Stock and securities (SEE STATEMENT 13), Inventory, Other property (not listed under another category), Property with built-in loss, Totals

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

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

If "Yes," go to line 12b.

b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation? . . . . .  Yes  No

If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.

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

If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.

d Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_

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

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00000 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No



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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **KAPLAN FIPS** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **37-41, RUE DE ROCHER** 5b Reference ID number (see instructions)

**PARIS FR 75008**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, 2,184.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.59978 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **BPI FRANCE HEXAGONE 2 FPCI** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **27-31 AV. DU GENERAL LECLERC  
 MAISONS-ALFORT FR 94710** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, 11,821.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.24234 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **CAM VC EU PLUS-CONTINUATION** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **5 HEIENHAFF** 5b Reference ID number (see instructions)  
**SENNINGERBERG LU L-1736**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

**Part III Information Regarding Transfer of Property** (see instructions)

**Section A - Cash**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Cash	12/31/2022		7,785.		

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

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

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized on transfer
Stock and securities					
Inventory					
Other property (not listed under another category)					
Property with built-in loss					
Totals					

- 11** Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed?  **Yes**  **No**
- 12a** Were any assets of a foreign branch (including a branch that is a foreign disregarded entity) transferred to a foreign corporation?  **Yes**  **No**  
 If "Yes," go to line 12b.
- b** Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch (including a branch that is a foreign disregarded entity) to a specified 10%-owned foreign corporation?  **Yes**  **No**  
 If "Yes," continue to line 12c. If "No," skip lines 12c and 12d, and go to line 13.
- c** Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation?  **Yes**  **No**  
 If "Yes," continue to line 12d. If "No," skip line 12d, and go to line 13.
- d** Enter the transferred loss amount included in gross income as required under section 91 ► \$ \_\_\_\_\_
- 13** Did the transferor transfer property described in section 367(d)(4)?  **Yes**  **No**  
 If "No," skip Section C and questions 14a through 15.

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

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 Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.59833 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **G.K. BCJ-51** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **5/F, PALACE BUILDING 1-1-1 MARUNOUCHI, CHIYODA-KU TOKYO JA 100-0005** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 10/25/2022, 138.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00005 %
- 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  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

**4** Name of transferee (foreign corporation) **GRANITE FRANCE HOLDCO SAS** **5a** Identifying number, if any **FOREIGNUS**

**6** Address (including country) **3-5 RUE SAINT-GEORGES** **5b** Reference ID number (see instructions)

**PARIS FR 75008**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 07/20/2022, 60.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder... [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00007 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **PROPULSION (BC) TOPCO SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **4 RUE LOU HEMMER** 5b Reference ID number (see instructions)  
**SENNINGERBERG LU L-1748**

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.



Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 09/15/2022, 71.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... [ ] Yes [ ] No
12b Was the transferor a domestic corporation... [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder... [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Totals row at the bottom.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00068 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **POSEIDON HOLDCO** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **12 PLACE DAUPHINE** **PARIS FR 75001** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 09/27/2022, 46.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00008 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **VILLA DUTCH HOLDCO B.V.** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **STRAWINSKYLAAN 1209**  
**AMSTERDAM NL 1077XX** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 11/03/2022, 64.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00038 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No



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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **PHOENIX TOWER INTERNATIONAL IBERICA II ETVE** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **C/O THE BLACKSTONE GROUP, 345 PARK AVENUE NEW YORK, NY 10154** 5b Reference ID number (see instructions)

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

8 Foreign law characterization (see instructions)

**CORPORATION**

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, 20.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00053 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	

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

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

4 Name of transferee (foreign corporation) **FUSION TOPCO LIMITED** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **11-15 SEATON PLACE** **ST HELIER JE JE4 0QH** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, , 42., ,

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... [ ] Yes [ ] No
12b Was the transferor a domestic corporation... [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder... [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4), Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00032 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **HEIMDALL LUXEMBOURG HOLDINGS II SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **5, PLACE DE LA GARE**  
**LUXEMBOURG LU L-1616** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, SEE STATEMENT, 14

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... [ ] Yes [ ] No
12b Was the transferor a domestic corporation... [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder... [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4)



- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.00164 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
MONTAUK TRIGUARD FUND VII, LP	82-2829807

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

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

4 Name of transferee (foreign corporation) **RISE INVESTMENTS SARL** 5a Identifying number, if any **FOREIGNUS**

6 Address (including country) **53, BOULEVARD ROYAL**  
**LUXEMBOURG LU L-2449** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 09/29/2022, 155.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder...? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.59372 % (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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor **ROBERT W. WOODRUFF ARTS CENTER, INC.** Identifying number (see instructions) **58-0633971**

- 1 Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  No
- 2 If the transferor was a corporation, complete questions 2a through 2d.
- a If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  No
- b Did the transferor remain in existence after the transfer? . . . . .  Yes  No
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership
TIGER GLOBAL, LP	13-4165054

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

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

4 Name of transferee (foreign corporation) **TIGER GLOBAL C, LTD** 5a Identifying number, if any **98-1631655**

6 Address (including country) **C/O CAMPBELLS CORPORATE SERVICES LTD, FLOOR 4, WILLOW GRAND CAYMAN CJ KY1-9010** 5b Reference ID number (see instructions)

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

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

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

For Paperwork Reduction Act Notice, see separate instructions.

Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 11/04/2022, 105,600.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

- 11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.13312 %
- 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.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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

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

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

Name of transferor <b>ROBERT W. WOODRUFF ARTS CENTER, INC.</b>	Identifying number (see instructions) <b>58-0633971</b>
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- 1** Is the transferee a specified 10%-owned foreign corporation that is not a controlled foreign corporation? . . .  Yes  **No**
- 2** If the transferor was a corporation, complete questions 2a through 2d.
- a** If the transfer was a section 361(a) or (b) transfer, was the transferor controlled (under section 368(c)) by five or fewer domestic corporations? . . . . .  Yes  **No**
- b** Did the transferor remain in existence after the transfer? . . . . .  Yes  **No**
- If not, list the controlling shareholder(s) and their identifying number(s).

Controlling shareholder	Identifying number

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

Name of parent corporation	EIN of parent corporation

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

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

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

Name of partnership	EIN of partnership

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

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

<b>4</b> Name of transferee (foreign corporation) <b>CLAYTON, DUBILIER &amp; RICE FUND X (CREDIT), LP</b>	<b>5a</b> Identifying number, if any <b>98-1446590</b>
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<b>6</b> Address (including country) PO BOX 309, UGLAND HOUSE GRAND CAYMAN CJ KY1-1104	<b>5b</b> Reference ID number (see instructions)
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**7** Country code of country of incorporation or organization (see instructions)  
**CJ**

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

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

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



Part III Information Regarding Transfer of Property (see instructions)

Section A - Cash

Table with 6 columns: 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. Row 1: Cash, 12/31/2022, 158,900.

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

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

Table with 6 columns: 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. Rows include Stock and securities, Inventory, Other property, Property with built-in loss, and Totals.

11 Did the transferor transfer stock or securities subject to section 367(a) with respect to which a gain recognition agreement was filed? [ ] Yes [ ] No
12a Were any assets of a foreign branch... transferred to a foreign corporation? [ ] Yes [ ] No
12b Was the transferor a domestic corporation that transferred substantially all of the assets of a foreign branch... to a specified 10%-owned foreign corporation? [ ] Yes [ ] No
12c Immediately after the transfer, was the domestic corporation a U.S. shareholder with respect to the transferee foreign corporation? [ ] Yes [ ] No
12d Enter the transferred loss amount included in gross income as required under section 91 [ ] \$
13 Did the transferor transfer property described in section 367(d)(4)? [ ] Yes [ ] No

Section C - Intangible Property Subject to Section 367(d)

Table with 7 columns: 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). Row 1: Property described in sec. 367(d)(4). Row 2: Totals.

- 14a Did the transferor transfer any intangible property that, at the time of the transfer, had a useful life reasonably anticipated to exceed 20 years?  Yes  No
- b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?  Yes  No
- c Did the transferor choose to apply the 20-year inclusion period provided under Regulations section 1.367(d)-1(c)(3)(ii) for any intangible property?  Yes  No
- d If the answer to line 14c is "Yes," enter the total estimated anticipated income or cost reduction attributable to the intangible property's, or properties', as applicable, use(s) beyond the 20-year period described in Regulations section 1.367(d)-1(c)(3)(ii) ► \$ \_\_\_\_\_
- 15 Was any intangible property transferred considered or anticipated to be, at the time of the transfer or at any time thereafter, a platform contribution as defined in Regulations section 1.482-7(c)(1)?  Yes  No

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

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**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 0.07920 % (b) After 0.07870 %
- 17 Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
- 18 Indicate whether any transfer reported in Part III is subject to any of the following.
  - a Gain recognition under section 904(f)(3)  Yes  No
  - b Gain recognition under section 904(f)(5)(F)  Yes  No
  - c Recapture under section 1503(d)  Yes  No
  - d Exchange gain under section 987  Yes  No
- 19 Did this transfer result from a change in entity classification?  Yes  No
- 20a Did a domestic corporation make a distribution of property covered by section 367(e)(2)? See instructions. If "Yes," complete lines 20b and 20c.  Yes  No
- b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b) ► \$ \_\_\_\_\_
- c Did the domestic corporation not recognize gain or loss on the distribution of property because the property was used in the conduct of U.S. trade or business under Regulations section 1.367(e)-2(b)(2)?  Yes  No
- 21 Did a domestic corporation make a section 355 distribution of stock in a foreign controlled corporation covered by section 367(e)(1)? See instructions  Yes  No

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
04/29/2022	EUROS	698.	698.	
04/28/2022	EUROS	15,408.	15,408.	

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

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(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
12/23/2022	EUROS	2,727.	2,727.	

=====

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
04/26/2022	EUROS	2,802.	2,802.	

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
08/03/2022	EUROS	1,568.	1,568.	

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

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

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
05/03/2022	EUROS	14.	14.	
05/17/2022	EUROS	22,337.	22,337.	



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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

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(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
01/18/2022	EUROS	30,370.	30,370.	

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
03/16/2022	EUROS	141.	141.	
11/14/2022	EUROS	15,930.	15,930.	

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
05/20/2022	EUROS	2,882.	2,882.	

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FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
10/14/2022	EUROS	1.	1.	

=====

FORM 926 - PART III - TRANSFERS - OTHER PROPERTY

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
11/14/2022	EUROS	28,641.	28,641.	

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FORM 926 - PART III - TRANSFERS - STOCK AND SECURITIES

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
09/27/2021	SECURITIES	87.	87.	

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FORM 926 - PART III - TRANSFERS - STOCK AND SECURITIES

=====

(A) DATE OF TRANSFER	(B) DESCRIPTION OF PROPERTY	(C) FMV ON DATE OF TRANSFER	(D) COST OR OTHER BASIS	(F) GAIN RECOGNIZED ON TRANSFER
12/31/2021	SECURITIES	6.	6.	

=====

FORM 926 - PART III - TRANSFERS - CASH

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(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.



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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 06/01/2022, and ending 05/31/2023

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions) Table with columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: DIGITAL ALPHA FUND A, LP 3535 EXECUTIVE TERMINAL DRIVE STE 110 HENDERSON, NV 89052 2(a) EIN (if any): 98-1350432 2(b) Reference ID number (see instructions) 3 Country under whose laws organized: CJ

4 Date of organization: 06/05/2017 5 Principal place of business: CJ 6 Principal business activity code number: 523900 7 Principal business activity: INVESTING 8a Functional currency: USD 8b Exchange rate (see instructions): 1.000000000000

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: [ ] 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 organization, if any: STMT 1 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: MAPLES CORPORATE SERVICES LIMITED

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 [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)? [ ] Yes [X] No 7 Were any special allocations made by the foreign partnership? [ ] Yes [X] No 8 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 10a 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 [ ] Yes [X] No b 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)? [ ] Yes [ ] No 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [X] No If "Yes," don't complete Schedules L, M-1, and M-2.



**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.

<b>Income</b>	<b>1a</b> Gross receipts or sales . . . . .	<b>1a</b>		
	<b>b</b> Less returns and allowances . . . . .	<b>1b</b>		<b>1c</b>
	<b>2</b> Cost of goods sold . . . . .			<b>2</b>
	<b>3</b> Gross profit. Subtract line 2 from line 1c . . . . .			<b>3</b>
	<b>4</b> Ordinary income (loss) from other partnerships, estates, and trusts (attach statement) . . . . .			<b>4</b>
	<b>5</b> Net farm profit (loss) (attach Schedule F (Form 1040)) . . . . .			<b>5</b>
	<b>6</b> Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797) . . . . .			<b>6</b>
	<b>7</b> Other income (loss) (attach statement) . . . . .			<b>7</b>
<b>8</b> <b>Total income (loss).</b> Combine lines 3 through 7 . . . . .			<b>8</b>	
<b>Deductions</b> (see instructions for limitations)	<b>9</b> Salaries and wages (other than to partners) (less employment credits) . . . . .			<b>9</b>
	<b>10</b> Guaranteed payments to partners . . . . .			<b>10</b>
	<b>11</b> Repairs and maintenance . . . . .			<b>11</b>
	<b>12</b> Bad debts . . . . .			<b>12</b>
	<b>13</b> Rent . . . . .			<b>13</b>
	<b>14</b> Taxes and licenses . . . . .			<b>14</b>
	<b>15</b> Interest (see instructions) . . . . .			<b>15</b>
	<b>16a</b> Depreciation (if required, attach Form 4562) . . . . .	<b>16a</b>		
	<b>b</b> Less depreciation reported elsewhere on return . . . . .	<b>16b</b>		<b>16c</b>
	<b>17</b> Depletion ( <b>Don't</b> deduct oil and gas depletion.) . . . . .			<b>17</b>
	<b>18</b> Retirement plans, etc. . . . .			<b>18</b>
	<b>19</b> Employee benefit programs . . . . .			<b>19</b>
	<b>20</b> Other deductions (attach statement) . . . . .			<b>20</b>
<b>21</b> <b>Total deductions.</b> Add the amounts shown in the far right column for lines 9 through 20 . . . . .			<b>21</b>	
<b>22</b> <b>Ordinary business income (loss)</b> from trade or business activities. Subtract line 21 from line 8 . . . . .			<b>22</b>	
<b>Tax and Payment</b>	<b>23</b> Reserved for future use . . . . .			<b>23</b>
	<b>24</b> Reserved for future use . . . . .			<b>24</b>
	<b>25</b> Reserved for future use . . . . .			<b>25</b>
	<b>26</b> Reserved for future use . . . . .			<b>26</b>
	<b>27</b> Reserved for future use . . . . .			<b>27</b>
	<b>28</b> Reserved for future use . . . . .			<b>28</b>
	<b>29</b> Reserved for future use . . . . .			<b>29</b>
	<b>30</b> Reserved for future use . . . . .			<b>30</b>

**Schedule K Partners' Distributive Share Items**

				Total amount
<b>Income (Loss)</b>	<b>1</b> Ordinary business income (loss) (Schedule B, line 22) . . . . .			<b>1</b>
	<b>2</b> Net rental real estate income (loss) (attach Form 8825) . . . . .			<b>2</b>
	<b>3a</b> Other gross rental income (loss) . . . . .	<b>3a</b>		
	<b>b</b> Expenses from other rental activities (attach statement) . . . . .	<b>3b</b>		
	<b>c</b> Other net rental income (loss). Subtract line 3b from line 3a . . . . .			<b>3c</b>
	<b>4</b> Guaranteed payments: <b>a</b> Services <b>4a</b> <b>b</b> Capital <b>4b</b> . . . . .			
	<b>c</b> Total. Add line 4a and line 4b . . . . .			<b>4c</b>
	<b>5</b> Interest income . . . . .			<b>5</b>
	<b>6</b> Dividends and dividend equivalents: <b>a</b> Ordinary dividends . . . . .			<b>6a</b>
	<b>b</b> Qualified dividends . . . . .	<b>6b</b>		
	<b>c</b> Dividend equivalents . . . . .	<b>6c</b>		
<b>7</b> Royalties . . . . .			<b>7</b>	
<b>8</b> Net short-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>8</b>	
<b>9a</b> Net long-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>9a</b>	
<b>b</b> Collectibles (28%) gain (loss) . . . . .	<b>9b</b>			
<b>c</b> Unrecaptured section 1250 gain (attach statement) . . . . .	<b>9c</b>			
<b>10</b> Net section 1231 gain (loss) (attach Form 4797) . . . . .			<b>10</b>	
<b>11</b> Other income (loss) (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>11(2)</b>	
<b>Deductions</b>	<b>12</b> Section 179 deduction (attach Form 4562) . . . . .			<b>12</b>
	<b>13a</b> Contributions . . . . .			<b>13a</b>
	<b>b</b> Investment interest expense . . . . .			<b>13b</b>
	<b>c</b> Section 59(e)(2) expenditures: <b>(1)</b> Type <b>(2)</b> Amount			<b>13c(2)</b>
<b>d</b> Other deductions (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>13d(2)</b>	

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .			
4 Other increases (itemize): \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor <b>DIGITAL ALPHA FUND A, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>DIGITAL ALPHA FUND A, LP</b>	EIN (if any) <b>98-1350432</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions  Yes  **No**
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  **No**
- 2** 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**

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
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							
<b>Totals</b>			128,898.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer **2.530 %** (b) After the transfer **1.981 %**

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?  Yes  **No**

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

Schedule O (Form 8865) 10-2021

FORM 8865, PAGE 1 DETAIL

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ITEM H3 - AGENT IN COUNTRY OF ORIGIN

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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

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SCHEDULE A-3 - AFFILIATION SCHEDULE

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NAME LINE 1: DA CLOUD HOLDINGS, LLC  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 98-1414746  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CITIES DIGITAL INFRASTRUCTURE, LLC  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 84-3722404

NAME LINE 1: CONNECTED FUTURE, LLC  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 84-1789181

NAME LINE 1: DA SAFETY SOLUTIONS I, LP  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 98-1589850  
FOREIGN PARTNERSHIP: X

NAME LINE 1: DIGITAL ALPHA SOLUTIONS FUND, LP  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 98-1681558  
FOREIGN PARTNERSHIP: X

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ], 2 [ ], 3 [X], 4 [ ] B Filer's tax year beginning 01/01/2022, and ending 12/31/2022

C Filer's share of liabilities: Nonrecourse \$, Qualified nonrecourse financing \$, Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name, EIN, Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions)

Table with 4 columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: LAKESTAR III, LP, EAST WING, TRAFALGAR COURT, LES BANQUES ST PETER PORT, GK GY1 3PP. 2(a) EIN (if any): 98-1473139. 2(b) Reference ID number (see instructions). 3 Country under whose laws organized: GK

4 Date of organization: 08/03/2017. 5 Principal place of business: GK. 6 Principal business activity code number: 523900. 7 Principal business activity: INVESTMENTS. 8a Functional currency: EUR. 8b Exchange rate (see instructions): 0.95094000000

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States. 2 Check if the foreign partnership must file: [ ] 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 organization, if any: STMT 1, LAKESTAR III (G.P.) LIMITED. 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: STMT 1, AZTEC FINANCIAL SERVICES (GUERNSEY) LIMITED

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, [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)? [ ] Yes, [ ] No

7 Were any special allocations made by the foreign partnership? [X] Yes, [ ] No

8 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? LIMITED PARTNERSHIP

10a 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. [ ] Yes, [X] No

b 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)? [ ] Yes, [ ] No

11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes, [X] No. 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)

- 12 a Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions.  Yes  No
- b 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) . . . . . \_\_\_\_\_
- c 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. . . . . \_\_\_\_\_
- d 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? . . . . .  Yes  No

**Sign Here Only if You're Filing This Form Separately and Not With Your Tax Return.** Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge.

Signature of general partner or limited liability company member \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name			Firm's EIN	
	Firm's address			Phone no.	

**Schedule A Constructive Ownership of Partnership Interest.** Check the boxes that apply to the filer. If you check 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.

- a  Owns a direct interest
- b  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

**Schedule A-1 Certain Partners of Foreign Partnership (see instructions)**

Name	Address	Identification number (if any)	Check if foreign person

**Schedule A-2 Foreign Partners of Section 721(c) Partnership (see instructions)**

Name of foreign partner	Address	Country of organization (if any)	U.S. taxpayer identification number (if any)	Check if related to U.S. transferor	Percentage interest	
					Capital	Profits
					%	%
					%	%

Does the partnership have any other foreign person as a direct partner?  Yes  No

**Schedule A-3 Affiliation Schedule.** List all partnerships (foreign or domestic) in which the foreign partnership owns a direct interest or indirectly owns a 10% interest.

Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership

**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.

<b>Income</b>	<b>1a</b> Gross receipts or sales . . . . .	<b>1a</b>		
	<b>b</b> Less returns and allowances . . . . .	<b>1b</b>		<b>1c</b>
	<b>2</b> Cost of goods sold . . . . .			<b>2</b>
	<b>3</b> Gross profit. Subtract line 2 from line 1c . . . . .			<b>3</b>
	<b>4</b> Ordinary income (loss) from other partnerships, estates, and trusts (attach statement) . . . . .			<b>4</b>
	<b>5</b> Net farm profit (loss) (attach Schedule F (Form 1040)) . . . . .			<b>5</b>
	<b>6</b> Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797) . . . . .			<b>6</b>
	<b>7</b> Other income (loss) (attach statement) . . . . .			<b>7</b>
<b>8</b> <b>Total income (loss).</b> Combine lines 3 through 7 . . . . .			<b>8</b>	
<b>Deductions</b> (see instructions for limitations)	<b>9</b> Salaries and wages (other than to partners) (less employment credits) . . . . .			<b>9</b>
	<b>10</b> Guaranteed payments to partners . . . . .			<b>10</b>
	<b>11</b> Repairs and maintenance . . . . .			<b>11</b>
	<b>12</b> Bad debts . . . . .			<b>12</b>
	<b>13</b> Rent . . . . .			<b>13</b>
	<b>14</b> Taxes and licenses . . . . .			<b>14</b>
	<b>15</b> Interest (see instructions) . . . . .			<b>15</b>
	<b>16a</b> Depreciation (if required, attach Form 4562) . . . . .	<b>16a</b>		
	<b>b</b> Less depreciation reported elsewhere on return . . . . .	<b>16b</b>		<b>16c</b>
	<b>17</b> Depletion ( <b>Don't</b> deduct oil and gas depletion.) . . . . .			<b>17</b>
	<b>18</b> Retirement plans, etc. . . . .			<b>18</b>
<b>19</b> Employee benefit programs . . . . .			<b>19</b>	
<b>20</b> Other deductions (attach statement) . . . . .			<b>20</b>	
<b>21</b> <b>Total deductions.</b> Add the amounts shown in the far right column for lines 9 through 20 . . . . .			<b>21</b>	
<b>22</b> <b>Ordinary business income (loss)</b> from trade or business activities. Subtract line 21 from line 8 . . . . .			<b>22</b>	
<b>Tax and Payment</b>	<b>23</b> Reserved for future use . . . . .			<b>23</b>
	<b>24</b> Reserved for future use . . . . .			<b>24</b>
	<b>25</b> Reserved for future use . . . . .			<b>25</b>
	<b>26</b> Reserved for future use . . . . .			<b>26</b>
	<b>27</b> Reserved for future use . . . . .			<b>27</b>
	<b>28</b> Reserved for future use . . . . .			<b>28</b>
	<b>29</b> Reserved for future use . . . . .			<b>29</b>
	<b>30</b> Reserved for future use . . . . .			<b>30</b>

**Schedule K Partners' Distributive Share Items**

**Total amount**

<b>Income (Loss)</b>	<b>1</b> Ordinary business income (loss) (Schedule B, line 22) . . . . .			<b>1</b>
	<b>2</b> Net rental real estate income (loss) (attach Form 8825) . . . . .			<b>2</b>
	<b>3a</b> Other gross rental income (loss) . . . . .	<b>3a</b>		
	<b>b</b> Expenses from other rental activities (attach statement) . . . . .	<b>3b</b>		
	<b>c</b> Other net rental income (loss). Subtract line 3b from line 3a . . . . .			<b>3c</b>
	<b>4</b> Guaranteed payments: <b>a</b> Services <b>4a</b> <b>b</b> Capital <b>4b</b> . . . . .			
	<b>c</b> Total. Add line 4a and line 4b . . . . .			<b>4c</b>
	<b>5</b> Interest income . . . . .			<b>5</b>
	<b>6</b> Dividends and dividend equivalents: <b>a</b> Ordinary dividends . . . . .			<b>6a</b>
	<b>b</b> Qualified dividends . . . . .	<b>6b</b>		
	<b>c</b> Dividend equivalents . . . . .	<b>6c</b>		
<b>7</b> Royalties . . . . .			<b>7</b>	
<b>8</b> Net short-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>8</b>	
<b>9a</b> Net long-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>9a</b>	
<b>b</b> Collectibles (28%) gain (loss) . . . . .	<b>9b</b>			
<b>c</b> Unrecaptured section 1250 gain (attach statement) . . . . .	<b>9c</b>			
<b>10</b> Net section 1231 gain (loss) (attach Form 4797) . . . . .			<b>10</b>	
<b>11</b> Other income (loss) (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>11(2)</b>	
<b>Deductions</b>	<b>12</b> Section 179 deduction (attach Form 4562) . . . . .			<b>12</b>
	<b>13a</b> Contributions . . . . .			<b>13a</b>
	<b>b</b> Investment interest expense . . . . .			<b>13b</b>
	<b>c</b> Section 59(e)(2) expenditures: <b>(1)</b> Type <b>(2)</b> Amount			<b>13c(2)</b>
<b>d</b> Other deductions (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>13d(2)</b>	

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

**Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")**

<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .			
4 Other increases (itemize): \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ Attach to Form 8865. See the Instructions for Form 8865.  
▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.

OMB No. 1545-1668

Name of transferor <b>LAKESTAR III, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>LAKESTAR III, LP</b>	EIN (if any) <b>98-1473139</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No
- 2** 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

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on 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 property	09/15/2022	FOREIGN CURRENC	168,628.	168,330.			
<b>Totals</b>			168,628.	168,330.			

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer **0.515 %** (b) After the transfer **0.515 %**

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?  Yes  No

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

Schedule O (Form 8865) 10-2021



FORM 8865, PAGE 1 DETAIL

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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  
CITY: LES BANQUES  
STATE: ST PETER PORT  
COUNTRY: GK  
POSTAL CODE: BY1 3PP

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 01/01/2022, and ending 12/31/2022

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions)

Table with 4 columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: LEFT LANE CAPITAL PARTNERS II, LP, 10 GRAND STREET, 21ST FLOOR, BROOKLYN, NY 11569. 2(a) EIN (if any): 98-1613299. 2(b) Reference ID number (see instructions). 3 Country under whose laws organized: CJ

4 Date of organization: 07/09/2021. 5 Principal place of business: US. 6 Principal business activity code number: 523900. 7 Principal business activity: INVESTMENT. 8a Functional currency: USD. 8b Exchange rate (see instructions): 1.000000000000

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States: LEFT LANE CAPITAL PARTNERS II, LP, 10 GRAND STREET, 21ST FLOOR, BROOKLYN, NY 11569, 98-1613299. 2 Check if the foreign partnership must file: [ ] 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 organization, if any: STMT 1, LEFT LANE CAPITAL PARTNERS II, LP. 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: STMT 1, LEFT LANE CAPITAL PARTNERS II, LP

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 [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)? [ ] Yes [X] No. 7 Were any special allocations made by the foreign partnership? [ ] Yes [X] No. 8 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. 10a 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. [ ] Yes [X] No. b 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)? . . . . . [ ] Yes [ ] No. 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [X] No. 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)

- 12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions.  Yes  No
- b** 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). \_\_\_\_\_
- c** 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. \_\_\_\_\_
- d** 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?  Yes  No

**Sign Here Only if You're Filing This Form Separately and Not With Your Tax Return.** Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge.

Signature of general partner or limited liability company member \_\_\_\_\_ Date \_\_\_\_\_

<b>Paid Preparer Use Only</b>	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name			Firm's EIN	
	Firm's address			Phone no.	

**Schedule A Constructive Ownership of Partnership Interest.** Check the boxes that apply to the filer. If you check 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.

- a**  Owns a direct interest **b**  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

**Schedule A-1 Certain Partners of Foreign Partnership** (see instructions)

Name	Address	Identification number (if any)	Check if foreign person

**Schedule A-2 Foreign Partners of Section 721(c) Partnership** (see instructions)

Name of foreign partner	Address	Country of organization (if any)	U.S. taxpayer identification number (if any)	Check if related to U.S. transferor	Percentage interest	
					Capital	Profits
					%	%
					%	%

Does the partnership have any other foreign person as a direct partner?  Yes  No

**Schedule A-3 Affiliation Schedule.** List all partnerships (foreign or domestic) in which the foreign partnership owns a direct interest or indirectly owns a 10% interest.

Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership
SEE STATEMENT 2				

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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include Gross receipts or sales, Less returns and allowances, Cost of goods sold, Gross profit, Ordinary income, Net farm profit, Net gain, Other income, Total income, Salaries and wages, Guaranteed payments, Repairs and maintenance, Bad debts, Rent, Taxes and licenses, Interest, Depreciation, Depletion, Retirement plans, Employee benefit programs, Other deductions, Total deductions, Ordinary business income, Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include Ordinary business income, Net rental real estate income, Other gross rental income, Expenses from other rental activities, Other net rental income, Guaranteed payments, Interest income, Dividends and dividend equivalents, Royalties, Net short-term capital gain, Net long-term capital gain, Net section 1231 gain, Other income, Section 179 deduction, Contributions, Investment interest expense, Section 59(e)(2) expenditures, Other deductions.

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**Schedule L Balance Sheets per Books.** (Not required if Item H11, page 1, is answered "Yes.") (continued)

Table with 4 columns: (a) Beginning of tax year, (b) End of tax year, (c), (d). Rows include: 13 Other assets, 14 Total assets, Liabilities and Capital, 15 Accounts payable, 16 Mortgages, notes, bonds payable in less than 1 year, 17 Other current liabilities, 18 All nonrecourse loans, 19 a Loans from partners, b Mortgages, notes, bonds payable in 1 year or more, 20 Other liabilities, 21 Partners' capital accounts, 22 Total liabilities and capital.

**Schedule M Balance Sheets for Interest Allocation**

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Total U.S. assets, 2 Total foreign assets: a Passive category, b General category, 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.")

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Net income (loss) per books, 2 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): \$, 3 Guaranteed payments (other than health insurance), 4 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 \$, 5 Add lines 1 through 4, 6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize): a Tax-exempt interest \$, 7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$, 8 Add lines 6 and 7, 9 Income (loss). Subtract line 8 from line 5.

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Balance at beginning of tax year, 2 Capital contributed: a Cash, b Property, 3 Net income (loss) per books, 4 Other increases (itemize): \$, 5 Add lines 1 through 4, 6 Distributions: a Cash, b Property, 7 Other decreases (itemize): \$, 8 Add lines 6 and 7, 9 Balance at end of tax year. Subtract line 8 from line 5.

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor <b>LEFT LANE CAPITAL PARTNERS II, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>LEFT LANE CAPITAL PARTNERS II, LP</b>	EIN (if any) <b>98-1613299</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  **Yes**  **No**
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  **Yes**  **No**
- 2** 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**

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		496,266.				
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							
<b>Totals</b>			496,266.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  **Yes**  **No**

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

Schedule O (Form 8865) 10-2021



FORM 8865, PAGE 1 DETAIL  
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ITEM H3 - AGENT IN COUNTRY OF ORIGIN  
-----

NAME LINE 1: LEFT LANE CAPITAL PARTNERS II, LP  
ADDRESS LINE 1: 10 GRAND STREET, 21ST FLOOR  
CITY: BROOKLYN  
STATE: NY  
ZIP: 11569

ITEM H4 - CUSTODIAN OF BOOKS AND RECORDS  
-----

NAME LINE 1: LEFT LANE CAPITAL PARTNERS II, LP  
ADDRESS LINE 1: 10 GRAND STREET, 21ST FLOOR  
CITY: BROOKLYN  
STATE: NY  
ZIP: 11569

FORM 8865, PAGE 2 DETAIL

=====

SCHEDULE A-3 - AFFILIATION SCHEDULE

-----

NAME LINE 1:	LEFT LANE CAPITAL PARTNERS II AGGREGATOR, LP
ADDRESS LINE 1:	10 GRAND STREET, 21ST FLOOR
CITY:	BROOKLYN
STATE:	NY
ZIP:	11569
ID:	98-1632971

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 01/01/2022, and ending 12/31/2022

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions)

Table with 4 columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XV FEEDER, LP FLOOR 4, WILLOW HOUSE GRAND CAYMAN CJ KY1-9010 2(a) EIN (if any): 98-1612415 2(b) Reference ID number (see instructions) 3 Country under whose laws organized: CJ

4 Date of organization: 06/16/2001 5 Principal place of business: CJ 6 Principal business activity code number: 523900 7 Principal business activity: INVESTMENTS 8a Functional currency: USD 8b Exchange rate (see instructions): 1.000000000000

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States: C/O TIGER GLOBAL MANAGEMENT, LLC 9 WEST 57TH STREET, 35TH FLOOR NEW YORK, NY 10019 2 Check if the foreign partnership must file: [ ] 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 organization, if any: STMT 1 C/O CAMPBELLS CORPORATE SERVICES LTD 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: STMT 1 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 [ ] Yes [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)? [ ] Yes [X] No

7 Were any special allocations made by the foreign partnership? [ ] Yes [X] No

8 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

10a 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 [ ] Yes [X] No

b 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)? [ ] Yes [ ] No

11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [X] No 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)



**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.

<b>Income</b>	<b>1a</b> Gross receipts or sales . . . . .	<b>1a</b>		
	<b>b</b> Less returns and allowances . . . . .	<b>1b</b>		<b>1c</b>
	<b>2</b> Cost of goods sold . . . . .			<b>2</b>
	<b>3</b> Gross profit. Subtract line 2 from line 1c . . . . .			<b>3</b>
	<b>4</b> Ordinary income (loss) from other partnerships, estates, and trusts (attach statement) . . . . .			<b>4</b>
	<b>5</b> Net farm profit (loss) (attach Schedule F (Form 1040)) . . . . .			<b>5</b>
	<b>6</b> Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797) . . . . .			<b>6</b>
	<b>7</b> Other income (loss) (attach statement) . . . . .			<b>7</b>
<b>8</b> <b>Total income (loss).</b> Combine lines 3 through 7 . . . . .			<b>8</b>	
<b>Deductions</b> (see instructions for limitations)	<b>9</b> Salaries and wages (other than to partners) (less employment credits) . . . . .			<b>9</b>
	<b>10</b> Guaranteed payments to partners . . . . .			<b>10</b>
	<b>11</b> Repairs and maintenance . . . . .			<b>11</b>
	<b>12</b> Bad debts . . . . .			<b>12</b>
	<b>13</b> Rent . . . . .			<b>13</b>
	<b>14</b> Taxes and licenses . . . . .			<b>14</b>
	<b>15</b> Interest (see instructions) . . . . .			<b>15</b>
	<b>16a</b> Depreciation (if required, attach Form 4562) . . . . .	<b>16a</b>		
	<b>b</b> Less depreciation reported elsewhere on return . . . . .	<b>16b</b>		<b>16c</b>
	<b>17</b> Depletion ( <b>Don't</b> deduct oil and gas depletion.) . . . . .			<b>17</b>
	<b>18</b> Retirement plans, etc. . . . .			<b>18</b>
	<b>19</b> Employee benefit programs . . . . .			<b>19</b>
	<b>20</b> Other deductions (attach statement) . . . . .			<b>20</b>
<b>21</b> <b>Total deductions.</b> Add the amounts shown in the far right column for lines 9 through 20 . . . . .			<b>21</b>	
<b>22</b> <b>Ordinary business income (loss)</b> from trade or business activities. Subtract line 21 from line 8 . . . . .			<b>22</b>	
<b>Tax and Payment</b>	<b>23</b> Reserved for future use . . . . .			<b>23</b>
	<b>24</b> Reserved for future use . . . . .			<b>24</b>
	<b>25</b> Reserved for future use . . . . .			<b>25</b>
	<b>26</b> Reserved for future use . . . . .			<b>26</b>
	<b>27</b> Reserved for future use . . . . .			<b>27</b>
	<b>28</b> Reserved for future use . . . . .			<b>28</b>
	<b>29</b> Reserved for future use . . . . .			<b>29</b>
	<b>30</b> Reserved for future use . . . . .			<b>30</b>

**Schedule K Partners' Distributive Share Items**

Total amount

<b>Income (Loss)</b>	<b>1</b> Ordinary business income (loss) (Schedule B, line 22) . . . . .			<b>1</b>
	<b>2</b> Net rental real estate income (loss) (attach Form 8825) . . . . .			<b>2</b>
	<b>3a</b> Other gross rental income (loss) . . . . .	<b>3a</b>		
	<b>b</b> Expenses from other rental activities (attach statement) . . . . .	<b>3b</b>		
	<b>c</b> Other net rental income (loss). Subtract line 3b from line 3a . . . . .			<b>3c</b>
	<b>4</b> Guaranteed payments: <b>a</b> Services <b>4a</b> <b>b</b> Capital <b>4b</b> . . . . .			
	<b>c</b> Total. Add line 4a and line 4b . . . . .			<b>4c</b>
	<b>5</b> Interest income . . . . .			<b>5</b>
	<b>6</b> Dividends and dividend equivalents: <b>a</b> Ordinary dividends . . . . .			<b>6a</b>
	<b>b</b> Qualified dividends . . . . .	<b>6b</b>		
	<b>c</b> Dividend equivalents . . . . .	<b>6c</b>		
<b>7</b> Royalties . . . . .			<b>7</b>	
<b>8</b> Net short-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>8</b>	
<b>9a</b> Net long-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>9a</b>	
<b>b</b> Collectibles (28%) gain (loss) . . . . .	<b>9b</b>			
<b>c</b> Unrecaptured section 1250 gain (attach statement) . . . . .	<b>9c</b>			
<b>10</b> Net section 1231 gain (loss) (attach Form 4797) . . . . .			<b>10</b>	
<b>11</b> Other income (loss) (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>11(2)</b>	
<b>Deductions</b>	<b>12</b> Section 179 deduction (attach Form 4562) . . . . .			<b>12</b>
	<b>13a</b> Contributions . . . . .			<b>13a</b>
	<b>b</b> Investment interest expense . . . . .			<b>13b</b>
	<b>c</b> Section 59(e)(2) expenditures: <b>(1)</b> Type <b>(2)</b> Amount			<b>13c(2)</b>
<b>d</b> Other deductions (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>13d(2)</b>	

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .			
4 Other increases (itemize): \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	

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

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

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



**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor <b>TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XV</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>TIGER GLOBAL PRIVATE INVESTMENT PARTNER</b>	EIN (if any) <b>98-1612415</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  **Yes**  **No**
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  **Yes**  **No**
- 2** 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**

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		900,000.				
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							
<b>Totals</b>			900,000.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer **0.177 %** (b) After the transfer **0.105 %**

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  **Yes**  **No**

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

Schedule O (Form 8865) 10-2021

FORM 8865, PAGE 1 DETAIL

=====

ITEM H3 - AGENT IN COUNTRY OF ORIGIN

-----

NAME LINE 1: C/O 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

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  
CITY: NEW YORK  
STATE: NY  
ZIP: 10019

FORM 8865, PAGE 2 DETAIL

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SCHEDULE A-3 - AFFILIATION SCHEDULE

-----

NAME LINE 1: TIGER GLOBAL PRIVATE INVESTMENT PARTNERS XV,  
NAME LINE 2: LP 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  
ID: 98-1611846  
FOREIGN PARTNERSHIP: X

NAME LINE 1: TIGER GLOBAL INTERMEDIARY 4, LP  
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  
ID: 98-1608256  
FOREIGN PARTNERSHIP: X

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  
ID: 98-1572067  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CEP SPV I, A SERIES OF CHANNEL EP, LLC  
ADDRESS LINE 1: 4291 CALLE MEJILLONES  
CITY: SAN DIEGO  
STATE: CA  
ZIP: 92130  
ID: 92-0323423

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

**2022**

Department of the Treasury  
Internal Revenue Service

Attach to your tax return.  
Go to [www.irs.gov/Form8865](http://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

Attachment  
Sequence No. **865**

Name of person filing this return: **ROBERT W. WOODRUFF ARTS CENTER, INC.** Filer's identification number: **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)): 1  2  3  4   
**B** Filer's tax year beginning 06/01/2022, and ending 05/31/2023

**C** Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:  
Name EIN  
Address

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions.

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership: FARALLON SPECIAL SITUATIONS FUND II, LP  
ONE MARITIME PLAZA, SUITE 2100  
SAN FRANCISCO, CA 94111  
**2(a)** EIN (if any): 98-1553042  
**2(b)** Reference ID number (see instructions)  
**3** Country under whose laws organized

<b>4</b> Date of organization	<b>5</b> Principal place of business	<b>6</b> Principal business activity code number	<b>7</b> Principal business activity	<b>8a</b> Functional currency	<b>8b</b> Exchange rate (see instructions)
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**H** Provide the following information for the foreign partnership's tax year:

**1** Name, address, and identification number of agent (if any) in the United States  
**2** Check if the foreign partnership must file:  
 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 organization, if any  
**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

- 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  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)?  Yes  No
- 7** Were any special allocations made by the foreign partnership?  Yes  No
- 8** 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? \_\_\_\_\_
- 10a** 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.  Yes  No
- b** 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)?  Yes  No
- 11** Does this partnership meet **both** of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
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.  Yes  No



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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include Gross receipts or sales, Less returns and allowances, Cost of goods sold, Gross profit, Ordinary income, Net farm profit, Net gain, Other income, Total income, Salaries and wages, Guaranteed payments, Repairs and maintenance, Bad debts, Rent, Taxes and licenses, Interest, Depreciation, Depletion, Retirement plans, Employee benefit programs, Other deductions, Total deductions, Ordinary business income, Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include Ordinary business income, Net rental real estate income, Other gross rental income, Expenses from other rental activities, Other net rental income, Guaranteed payments, Interest income, Dividends and dividend equivalents, Royalties, Net short-term capital gain, Net long-term capital gain, Collectibles gain, Unrecaptured section 1250 gain, Net section 1231 gain, Other income, Section 179 deduction, Contributions, Investment interest expense, Section 59(e)(2) expenditures, Other deductions.



<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .		8 Add lines 6 and 7. . . . .	
4 Other increases (itemize): \$ _____		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	
5 Add lines 1 through 4. . . . .			



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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor <b>FARALLON SPECIAL SITUATIONS FUND II, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>FARALLON SPECIAL SITUATIONS FUND II, LP</b>	EIN (if any) <b>98-1553042</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  **Yes**  **No**
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  **Yes**  **No**
- 2** 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**

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on 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							
<b>Totals</b>			820,906.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  **Yes**  **No**

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

Schedule O (Form 8865) 10-2021

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 06/01/2022, and ending 05/31/2023

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions)

Table with 4 columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: PC FEEDER VI, LP 3RD FL, LIBERATION HOUSE, CASTLE ST ST HELIER JE JE4 8PN 2(a) EIN (if any) 98-1522095 2(b) Reference ID number (see instructions) 3 Country under whose laws organized JE

Table with 6 columns: 4 Date of organization (02/28/2019), 5 Principal place of business (US), 6 Principal business activity code number (523900), 7 Principal business activity (INVESTMENTS), 8a Functional currency (USD), 8b Exchange rate (1.000000000000)

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: [ ] 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 organization, if any 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

- 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 [ ] No
6 Is the partnership a section 721(c) partnership, as defined in Regulations section 1.721(c)-1(b)(14)? [ ] Yes [ ] No
7 Were any special allocations made by the foreign partnership? [ ] Yes [ ] No
8 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?
10a 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. [ ] Yes [X] No
b 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)? [ ] Yes [ ] No
11 Does this partnership meet both of the following requirements?
1. The partnership's total receipts for the tax year were less than \$250,000.
2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [ ] No

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions. Form 8865 (2022)



**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.

<b>Income</b>	<b>1a</b> Gross receipts or sales . . . . .	<b>1a</b>		
	<b>b</b> Less returns and allowances . . . . .	<b>1b</b>		<b>1c</b>
	<b>2</b> Cost of goods sold . . . . .			<b>2</b>
	<b>3</b> Gross profit. Subtract line 2 from line 1c . . . . .			<b>3</b>
	<b>4</b> Ordinary income (loss) from other partnerships, estates, and trusts (attach statement) . . . . .			<b>4</b>
	<b>5</b> Net farm profit (loss) (attach Schedule F (Form 1040)) . . . . .			<b>5</b>
	<b>6</b> Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797) . . . . .			<b>6</b>
	<b>7</b> Other income (loss) (attach statement) . . . . .			<b>7</b>
<b>8</b> <b>Total income (loss).</b> Combine lines 3 through 7 . . . . .			<b>8</b>	
<b>Deductions</b> (see instructions for limitations)	<b>9</b> Salaries and wages (other than to partners) (less employment credits) . . . . .			<b>9</b>
	<b>10</b> Guaranteed payments to partners . . . . .			<b>10</b>
	<b>11</b> Repairs and maintenance . . . . .			<b>11</b>
	<b>12</b> Bad debts . . . . .			<b>12</b>
	<b>13</b> Rent . . . . .			<b>13</b>
	<b>14</b> Taxes and licenses . . . . .			<b>14</b>
	<b>15</b> Interest (see instructions) . . . . .			<b>15</b>
	<b>16a</b> Depreciation (if required, attach Form 4562) . . . . .	<b>16a</b>		
	<b>b</b> Less depreciation reported elsewhere on return . . . . .	<b>16b</b>		<b>16c</b>
	<b>17</b> Depletion ( <b>Don't</b> deduct oil and gas depletion.) . . . . .			<b>17</b>
	<b>18</b> Retirement plans, etc. . . . .			<b>18</b>
	<b>19</b> Employee benefit programs . . . . .			<b>19</b>
	<b>20</b> Other deductions (attach statement) . . . . .			<b>20</b>
<b>21</b> <b>Total deductions.</b> Add the amounts shown in the far right column for lines 9 through 20 . . . . .			<b>21</b>	
<b>22</b> <b>Ordinary business income (loss)</b> from trade or business activities. Subtract line 21 from line 8 . . . . .			<b>22</b>	
<b>Tax and Payment</b>	<b>23</b> Reserved for future use . . . . .			<b>23</b>
	<b>24</b> Reserved for future use . . . . .			<b>24</b>
	<b>25</b> Reserved for future use . . . . .			<b>25</b>
	<b>26</b> Reserved for future use . . . . .			<b>26</b>
	<b>27</b> Reserved for future use . . . . .			<b>27</b>
	<b>28</b> Reserved for future use . . . . .			<b>28</b>
	<b>29</b> Reserved for future use . . . . .			<b>29</b>
	<b>30</b> Reserved for future use . . . . .			<b>30</b>

**Schedule K Partners' Distributive Share Items**

Total amount

<b>Income (Loss)</b>	<b>1</b> Ordinary business income (loss) (Schedule B, line 22) . . . . .			<b>1</b>
	<b>2</b> Net rental real estate income (loss) (attach Form 8825) . . . . .			<b>2</b>
	<b>3a</b> Other gross rental income (loss) . . . . .	<b>3a</b>		
	<b>b</b> Expenses from other rental activities (attach statement) . . . . .	<b>3b</b>		
	<b>c</b> Other net rental income (loss). Subtract line 3b from line 3a . . . . .			<b>3c</b>
	<b>4</b> Guaranteed payments: <b>a</b> Services <b>4a</b> <b>b</b> Capital <b>4b</b> . . . . .			
	<b>c</b> Total. Add line 4a and line 4b . . . . .			<b>4c</b>
	<b>5</b> Interest income . . . . .			<b>5</b>
	<b>6</b> Dividends and dividend equivalents: <b>a</b> Ordinary dividends . . . . .			<b>6a</b>
	<b>b</b> Qualified dividends . . . . .	<b>6b</b>		
	<b>c</b> Dividend equivalents . . . . .	<b>6c</b>		
<b>7</b> Royalties . . . . .			<b>7</b>	
<b>8</b> Net short-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>8</b>	
<b>9a</b> Net long-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>9a</b>	
<b>b</b> Collectibles (28%) gain (loss) . . . . .	<b>9b</b>			
<b>c</b> Unrecaptured section 1250 gain (attach statement) . . . . .	<b>9c</b>			
<b>10</b> Net section 1231 gain (loss) (attach Form 4797) . . . . .			<b>10</b>	
<b>11</b> Other income (loss) (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>11(2)</b>	
<b>Deductions</b>	<b>12</b> Section 179 deduction (attach Form 4562) . . . . .			<b>12</b>
	<b>13a</b> Contributions . . . . .			<b>13a</b>
	<b>b</b> Investment interest expense . . . . .			<b>13b</b>
	<b>c</b> Section 59(e)(2) expenditures: <b>(1)</b> Type <b>(2)</b> Amount			<b>13c(2)</b>
<b>d</b> Other deductions (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>13d(2)</b>	

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<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .			
4 Other increases (itemize): \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	

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

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

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



**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ Attach to Form 8865. See the Instructions for Form 8865.  
▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.

OMB No. 1545-1668

Name of transferor PC FEEDER VI, LP		Filer's identifying number 58-0633971
Name of foreign partnership PC FEEDER VI, LP	EIN (if any) 98-1522095	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No
- 2** 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

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		717,780.				
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							
<b>Totals</b>			717,780.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer 74.390 % (b) After the transfer 74.390 %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?  Yes  No

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

Schedule O (Form 8865) 10-2021

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 06/01/2022, and ending 05/31/2023

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions)

Table with 4 columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: RA CAPITAL NEXUS INTERNATIONAL FUND III, LP PO BOX 39, UGLAND HOUSE SOUTH CHURCH ST GEORGE TOWN GRAND CAYMAN CJ KY-1-1104 2(a) EIN (if any) 98-1619538 2(b) Reference ID number (see instructions) 3 Country under whose laws organized CJ

4 Date of organization: 10/01/2021 5 Principal place of business: US 6 Principal business activity code number: 523900 7 Principal business activity: INVESTMENTS 8a Functional currency: USD 8b Exchange rate (see instructions): 1.000000000000

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: [ ] 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 organization, if any 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

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 [ ] 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)? [ ] Yes [ ] No 7 Were any special allocations made by the foreign partnership? [ ] Yes [ ] No 8 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? 10a 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. [ ] Yes [X] No b 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)? [ ] Yes [ ] No 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [X] No If "Yes," don't complete Schedules L, M-1, and M-2.



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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include: 1a Gross receipts or sales, 1b Less returns and allowances, 2 Cost of goods sold, 3 Gross profit, 4 Ordinary income (loss) from other partnerships, 5 Net farm profit (loss), 6 Net gain (loss) from Form 4797, 7 Other income (loss), 8 Total income (loss), 9 Salaries and wages, 10 Guaranteed payments to partners, 11 Repairs and maintenance, 12 Bad debts, 13 Rent, 14 Taxes and licenses, 15 Interest, 16a Depreciation, 16b Less depreciation reported elsewhere, 17 Depletion, 18 Retirement plans, etc., 19 Employee benefit programs, 20 Other deductions, 21 Total deductions, 22 Ordinary business income (loss), 23-30 Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include: 1 Ordinary business income (loss), 2 Net rental real estate income (loss), 3a Other gross rental income (loss), 3b Expenses from other rental activities, 3c Other net rental income (loss), 4 Guaranteed payments (a Services, b Capital), 4a, 4b, 4c Total, 5 Interest income, 6 Dividends and dividend equivalents (a Ordinary dividends, b Qualified dividends, c Dividend equivalents), 6a, 6b, 6c, 7 Royalties, 8 Net short-term capital gain (loss), 9a Net long-term capital gain (loss), 9b Collectibles (28%) gain (loss), 9c Unrecaptured section 1250 gain, 10 Net section 1231 gain (loss), 11 Other income (loss), 12 Section 179 deduction, 13a Contributions, 13b Investment interest expense, 13c(2) Section 59(e)(2) expenditures, 13d(2) Other deductions.

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
	<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**Schedule L Balance Sheets per Books.** (Not required if Item H11, page 1, is answered "Yes.") (continued)

Table with 4 columns: (a) Beginning of tax year, (b) Beginning of tax year, (c) End of tax year, (d) End of tax year. Rows include: 13 Other assets, 14 Total assets, Liabilities and Capital, 15 Accounts payable, 16 Mortgages, notes, bonds payable in less than 1 year, 17 Other current liabilities, 18 All nonrecourse loans, 19 a Loans from partners, b Mortgages, notes, bonds payable in 1 year or more, 20 Other liabilities, 21 Partners' capital accounts, 22 Total liabilities and capital.

**Schedule M Balance Sheets for Interest Allocation**

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Total U.S. assets, 2 Total foreign assets: a Passive category, b General category, c Other.

**Schedule M-1 Reconciliation of Income (Loss) per Books With Income (Loss) per Return.** (Not required if Item H11, page 1, is answered "Yes.")

Table with 2 columns: Description, Amount. Rows include: 1 Net income (loss) per books, 2 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): \$, 3 Guaranteed payments (other than health insurance), 4 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 \$, 5 Add lines 1 through 4, 6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize): a Tax-exempt interest \$, 7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$, 8 Add lines 6 and 7, 9 Income (loss). Subtract line 8 from line 5.

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

Table with 2 columns: Description, Amount. Rows include: 1 Balance at beginning of tax year, 2 Capital contributed: a Cash, b Property, 3 Net income (loss) per books, 4 Other increases (itemize): \$, 5 Add lines 1 through 4, 6 Distributions: a Cash, b Property, 7 Other decreases (itemize): \$, 8 Add lines 6 and 7, 9 Balance at end of tax year. Subtract line 8 from line 5.

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ Attach to Form 8865. See the Instructions for Form 8865.  
▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.

OMB No. 1545-1668

Name of transferor <b>RA CAPITAL NEXUS INTERNATIONAL FUND III, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>RA CAPITAL NEXUS INTERNATIONAL FUND III</b>	EIN (if any) <b>98-1619538</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No
- 2** 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

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on 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							
<b>Totals</b>			500,000.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  Yes  No

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

Schedule O (Form 8865) 10-2021



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

**2022**

Department of the Treasury  
Internal Revenue Service

Attach to your tax return.  
Go to [www.irs.gov/Form8865](http://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

Attachment Sequence No. **865**

Name of person filing this return: **ROBERT W. WOODRUFF ARTS CENTER, INC.** Filer's identification number: **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)): 1  2  3  4   
**B** Filer's tax year beginning 06/01/2022, and ending 05/31/2023

**C** Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:  
Name EIN  
Address

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions.

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership: **REDWOOD DRAWDOWN OFFSHORE FUND III, LP**  
PO BOX 31106, 89 NEXUS WAY  
CAMANA BAY GRAND CAYMAN  
CJ 31106  
**2(a)** EIN (if any)  
**2(b)** Reference ID number (see instructions): 001  
**3** Country under whose laws organized: CJ

<b>4</b> Date of organization	<b>5</b> Principal place of business: US	<b>6</b> Principal business activity code number: 523900	<b>7</b> Principal business activity: INVESTMENTS	<b>8a</b> Functional currency: USD	<b>8b</b> Exchange rate (see instructions): 1.000000000000
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**H** Provide the following information for the foreign partnership's tax year:

**1** Name, address, and identification number of agent (if any) in the United States  
**2** Check if the foreign partnership must file:  
 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 organization, if any  
**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

- 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  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)?  Yes  No
- 7** Were any special allocations made by the foreign partnership?  Yes  No
- 8** 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?
- 10a** 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.  Yes  No
- b** 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)?  Yes  No
- 11** Does this partnership meet **both** of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
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.  Yes  No

- 12 a** Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction (under section 250) with respect to any transaction with the foreign partnership? If "Yes," complete lines 12b, 12c, and 12d. See instructions. . . .  Yes  No
- b** 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). . . . \_\_\_\_\_
- c** 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. . . . \_\_\_\_\_
- d** 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? . . . .  Yes  No

**Sign Here Only if You're Filing This Form Separately and Not With Your Tax Return.** Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than general partner or limited liability company member) is based on all information of which preparer has any knowledge.

Signature of general partner or limited liability company member \_\_\_\_\_ Date \_\_\_\_\_

**Paid Preparer Use Only**

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name			Firm's EIN	
Firm's address			Phone no.	

**Schedule A Constructive Ownership of Partnership Interest.** Check the boxes that apply to the filer. If you check 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.

**a**  Owns a direct interest **b**  Owns a constructive interest

Name	Address	Identification number (if any)	Check if foreign person	Check if direct partner

**Schedule A-1 Certain Partners of Foreign Partnership (see instructions)**

Name	Address	Identification number (if any)	Check if foreign person

**Schedule A-2 Foreign Partners of Section 721(c) Partnership (see instructions)**

Name of foreign partner	Address	Country of organization (if any)	U.S. taxpayer identification number (if any)	Check if related to U.S. transferor	Percentage interest	
					Capital	Profits
					%	%
					%	%

Does the partnership have any other foreign person as a direct partner? . . . .  Yes  No

**Schedule A-3 Affiliation Schedule.** List all partnerships (foreign or domestic) in which the foreign partnership owns a direct interest or indirectly owns a 10% interest.

Name	Address	EIN (if any)	Total ordinary income or loss	Check if foreign partnership

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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include: 1a Gross receipts or sales, 1b Less returns and allowances, 2 Cost of goods sold, 3 Gross profit, 4 Ordinary income (loss) from other partnerships, 5 Net farm profit (loss), 6 Net gain (loss) from Form 4797, 7 Other income (loss), 8 Total income (loss), 9 Salaries and wages, 10 Guaranteed payments to partners, 11 Repairs and maintenance, 12 Bad debts, 13 Rent, 14 Taxes and licenses, 15 Interest, 16a Depreciation, 16b Less depreciation reported elsewhere, 17 Depletion, 18 Retirement plans, etc., 19 Employee benefit programs, 20 Other deductions, 21 Total deductions, 22 Ordinary business income (loss), 23-30 Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include: 1 Ordinary business income (loss), 2 Net rental real estate income (loss), 3a Other gross rental income (loss), 3b Expenses from other rental activities, 3c Other net rental income (loss), 4 Guaranteed payments (a Services, b Capital), 4a, 4b, 4c Total, 5 Interest income, 6 Dividends and dividend equivalents (a Ordinary, b Qualified, c Dividend equivalents), 6a, 6b, 6c, 7 Royalties, 8 Net short-term capital gain (loss), 9a Net long-term capital gain (loss), 9b Collectibles (28%) gain (loss), 9c Unrecaptured section 1250 gain, 10 Net section 1231 gain (loss), 11 Other income (loss) (1) Type (2) Amount, 11(2), 12 Section 179 deduction, 13a Contributions, 13b Investment interest expense, 13c(2) Section 59(e)(2) expenditures (1) Type (2) Amount, 13d(2) Other deductions (1) Type (2) Amount.

Schedule K		Partners' Distributive Share Items (continued)	Total amount	
Self-Employment	14a	Net earnings (loss) from self-employment. . . . .	14a	
	b	Gross farming or fishing income. . . . .	14b	
	c	Gross nonfarm income. . . . .	14c	
Credits	15a	Low-income housing credit (section 42(j)(5)). . . . .	15a	
	b	Low-income housing credit (other) . . . . .	15b	
	c	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	15c	
	d	Other rental real estate credits (see instructions) Type _____	15d	
	e	Other rental credits (see instructions) Type _____	15e	
	f	Other credits (see instructions) Type _____	15f	
International	16	Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>		
Alternative Minimum Tax (AMT) items	17a	Post-1986 depreciation adjustment. . . . .	17a	
	b	Adjusted gain or loss. . . . .	17b	
	c	Depletion (other than oil and gas). . . . .	17c	
	d	Oil, gas, and geothermal properties - gross income. . . . .	17d	
	e	Oil, gas, and geothermal properties - deductions . . . . .	17e	
	f	Other AMT items (attach statement) . . . . .	17f	
Other Information	18a	Tax-exempt interest income . . . . .	18a	
	b	Other tax-exempt income . . . . .	18b	
	c	Nondeductible expenses. . . . .	18c	
	19a	Distributions of cash and marketable securities. . . . .	19a	
	b	Distributions of other property. . . . .	19b	
	20a	Investment income. . . . .	20a	
	b	Investment expenses. . . . .	20b	
	c	Other items and amounts (attach statement)		
	21	Total foreign taxes paid or accrued . . . . .	21	

Schedule L		Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")			
Assets		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
1	Cash . . . . .				
2a	Trade notes and accounts receivable. . . . .				
b	Less allowance for bad debts . . . . .				
3	Inventories . . . . .				
4	U.S. Government obligations. . . . .				
5	Tax-exempt securities . . . . .				
6	Other current assets (attach statement)				
7a	Loans to partners (or persons related to partners) . . . . .				
b	Mortgage and real estate loans . . . . .				
8	Other investments (attach statement)				
9a	Buildings and other depreciable assets				
b	Less accumulated depreciation. . . . .				
10a	Depletable assets . . . . .				
b	Less accumulated depletion . . . . .				
11	Land (net of any amortization) . . . . .				
12a	Intangible assets (amortizable only) . . . . .				
b	Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____		8 Add lines 6 and 7. . . . .	
b Travel and entertainment \$ _____		9 Income (loss). Subtract line 8 from line 5 . . . . .	
5 Add lines 1 through 4. . . . .			

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .		8 Add lines 6 and 7. . . . .	
4 Other increases (itemize): \$ _____		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	
5 Add lines 1 through 4. . . . .			

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ Attach to Form 8865. See the Instructions for Form 8865.  
▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.

OMB No. 1545-1668

Name of transferor <b>REDWOOD DRAWDOWN OFFSHORE FUND III, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>REDWOOD DRAWDOWN OFFSHORE FUND III, LP</b>	EIN (if any)	Reference ID number (see instructions) <b>001</b>

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No
- 2** 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

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on 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							
<b>Totals</b>			2,400,000.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?  Yes  No

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

Schedule O (Form 8865) 10-2021

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 06/01/2022, and ending 05/31/2023

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions) Table with columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: ANCHORAGE CREDIT OPPS OFS FUND VIII (B), LP 190 ELGIN AVENUE GEORGE TOWN GRAND CAYMAN CJ KY1-9008 2(a) EIN (if any) 2(b) Reference ID number (see instructions) 002 3 Country under whose laws organized CJ

4 Date of organization: 08/09/2022 5 Principal place of business: US 6 Principal business activity code number: 523900 7 Principal business activity: INVESTMENTS 8a Functional currency: USD 8b Exchange rate (see instructions): 1.000000000000

H Provide the following information for the foreign partnership's tax year: 1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: [ ] Form 1042 [ ] Form 8804 [X] Form 1065 Service Center where Form 1065 is filed: 3 Name and address of foreign partnership's agent in country of organization, if any 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

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 [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)? [ ] Yes [X] No 7 Were any special allocations made by the foreign partnership? [ ] Yes [X] No 8 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? 10a 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 [ ] Yes [X] No b 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)? [ ] Yes [ ] No 11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [X] No If "Yes," don't complete Schedules L, M-1, and M-2.





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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include: 1a Gross receipts or sales, 1b Less returns and allowances, 2 Cost of goods sold, 3 Gross profit, 4 Ordinary income (loss) from other partnerships, 5 Net farm profit (loss), 6 Net gain (loss) from Form 4797, 7 Other income (loss), 8 Total income (loss), 9 Salaries and wages, 10 Guaranteed payments to partners, 11 Repairs and maintenance, 12 Bad debts, 13 Rent, 14 Taxes and licenses, 15 Interest, 16a Depreciation, 16b Less depreciation reported elsewhere, 17 Depletion, 18 Retirement plans, etc., 19 Employee benefit programs, 20 Other deductions, 21 Total deductions, 22 Ordinary business income (loss), 23-30 Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include: 1 Ordinary business income (loss), 2 Net rental real estate income (loss), 3a Other gross rental income (loss), 3b Expenses from other rental activities, 3c Other net rental income (loss), 4 Guaranteed payments (a Services, b Capital), 4c Total, 5 Interest income, 6 Dividends and dividend equivalents (a Ordinary dividends, b Qualified dividends, c Dividend equivalents), 7 Royalties, 8 Net short-term capital gain (loss), 9a Net long-term capital gain (loss), 9b Collectibles (28%) gain (loss), 9c Unrecaptured section 1250 gain, 10 Net section 1231 gain (loss), 11 Other income (loss), 12 Section 179 deduction, 13a Contributions, 13b Investment interest expense, 13c(2) Section 59(e)(2) expenditures, 13d(2) Other deductions.

<b>Schedule K</b>		<b>Partners' Distributive Share Items (continued)</b>	<b>Total amount</b>	
<b>Self-Employment</b>	<b>14a</b>	Net earnings (loss) from self-employment. . . . .	<b>14a</b>	
	<b>b</b>	Gross farming or fishing income. . . . .	<b>14b</b>	
	<b>c</b>	Gross nonfarm income. . . . .	<b>14c</b>	
<b>Credits</b>	<b>15a</b>	Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>	
	<b>b</b>	Low-income housing credit (other) . . . . .	<b>15b</b>	
	<b>c</b>	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>	
	<b>d</b>	Other rental real estate credits (see instructions) Type _____	<b>15d</b>	
	<b>e</b>	Other rental credits (see instructions) Type _____	<b>15e</b>	
	<b>f</b>	Other credits (see instructions) Type _____	<b>15f</b>	
<b>International</b>	<b>16</b>	Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>		
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b>	Post-1986 depreciation adjustment. . . . .	<b>17a</b>	
	<b>b</b>	Adjusted gain or loss. . . . .	<b>17b</b>	
	<b>c</b>	Depletion (other than oil and gas). . . . .	<b>17c</b>	
	<b>d</b>	Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>	
	<b>e</b>	Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>	
	<b>f</b>	Other AMT items (attach statement) . . . . .	<b>17f</b>	
<b>Other Information</b>	<b>18a</b>	Tax-exempt interest income . . . . .	<b>18a</b>	
	<b>b</b>	Other tax-exempt income . . . . .	<b>18b</b>	
	<b>c</b>	Nondeductible expenses. . . . .	<b>18c</b>	
	<b>19a</b>	Distributions of cash and marketable securities. . . . .	<b>19a</b>	
	<b>b</b>	Distributions of other property. . . . .	<b>19b</b>	
	<b>20a</b>	Investment income. . . . .	<b>20a</b>	
	<b>b</b>	Investment expenses. . . . .	<b>20b</b>	
	<b>c</b>	Other items and amounts (attach statement)		
	<b>21</b>	Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L</b>		<b>Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>			
<b>Assets</b>		Beginning of tax year		End of tax year	
		(a)	(b)	(c)	(d)
<b>1</b>	Cash . . . . .				
<b>2a</b>	Trade notes and accounts receivable. . . . .				
<b>b</b>	Less allowance for bad debts . . . . .				
<b>3</b>	Inventories . . . . .				
<b>4</b>	U.S. Government obligations. . . . .				
<b>5</b>	Tax-exempt securities . . . . .				
<b>6</b>	Other current assets (attach statement)				
<b>7a</b>	Loans to partners (or persons related to partners) . . . . .				
<b>b</b>	Mortgage and real estate loans . . . . .				
<b>8</b>	Other investments (attach statement)				
<b>9a</b>	Buildings and other depreciable assets				
<b>b</b>	Less accumulated depreciation. . . . .				
<b>10a</b>	Depletable assets . . . . .				
<b>b</b>	Less accumulated depletion . . . . .				
<b>11</b>	Land (net of any amortization) . . . . .				
<b>12a</b>	Intangible assets (amortizable only) . . . . .				
<b>b</b>	Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____		8 Add lines 6 and 7. . . . .	
b Travel and entertainment \$ _____		9 Income (loss). Subtract line 8 from line 5 . . . . .	
5 Add lines 1 through 4. . . . .			

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .		8 Add lines 6 and 7. . . . .	
4 Other increases (itemize): \$ _____		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	
5 Add lines 1 through 4. . . . .			

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ Attach to Form 8865. See the Instructions for Form 8865.  
▶ Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.

OMB No. 1545-1668

Name of transferor <b>ANCHORAGE CREDIT OPPS OFS FUND VIII (B), LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>ANCHORAGE CREDIT OPPS OFS FUND VIII (B)</b>	EIN (if any)	Reference ID number (see instructions) <b>002</b>

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No
- 2** 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

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		1,790,018.				
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							
<b>Totals</b>			1,790,018.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  Yes  No

For Paperwork Reduction Act Notice, see the Instructions for Form 8865. Schedule O (Form 8865) 10-2021

**Electronic Filing Information: PDF attachments Included in this Return**

**Tax Year:** 2022                      **Jurisdiction:** Federal  
**Name:** ROBERT W. WOODRUF        **No of Attachments:** 1  
**Return No:** E3370FZ2

<b>PDF Attachment Description</b>	<b>PDF File Name</b>	<b>File Size</b>
8453 Signature Document	E3370FZ2_FE_8865s.pdf	233,410

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

**2022**

Department of the Treasury  
Internal Revenue Service

Attach to your tax return.  
Go to [www.irs.gov/Form8865](http://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

Attachment  
Sequence No. **865**

Name of person filing this return: **ROBERT W. WOODRUFF ARTS CENTER, INC.** Filer's identification number: **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)):  
1  2  3  4   
**B** Filer's tax year beginning 01/01/2022, and ending 12/31/2022

**C** Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:  
Name EIN  
Address

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions.

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership: **CLAYTON, DUBILIER & RICE FUND X, LP**  
375 PARK AVENUE, 18TH FLOOR  
NEW YORK, NY 10152  
**2(a)** EIN (if any): **98-1319473**  
**2(b)** Reference ID number (see instructions)  
**3** Country under whose laws organized: **CJ**

<b>4</b> Date of organization: 07/01/2017	<b>5</b> Principal place of business: CJ	<b>6</b> Principal business activity code number: 523900	<b>7</b> Principal business activity: INVESTMENTS	<b>8a</b> Functional currency: USD	<b>8b</b> Exchange rate (see instructions): 1.000000000000
---	--	--	---	------------------------------------	--

**H** Provide the following information for the foreign partnership's tax year:  
**1** Name, address, and identification number of agent (if any) in the United States: **MAPLES & CALDER**  
**2** Check if the foreign partnership must file:  
 Form 1042  Form 8804  Form 1065  
Service Center where Form 1065 is filed: **EFILE**  
**3** Name and address of foreign partnership's agent in country of organization, if any: **STMT 1**  
**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

- 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  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)?  Yes  No
- 7** Were any special allocations made by the foreign partnership?  Yes  No
- 8** 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
- 10a** 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.  Yes  No
- b** 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)?  Yes  No
- 11** Does this partnership meet **both** of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
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.  Yes  No





**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.

<b>Income</b>	<b>1a</b> Gross receipts or sales . . . . .	<b>1a</b>		
	<b>b</b> Less returns and allowances . . . . .	<b>1b</b>		<b>1c</b>
	<b>2</b> Cost of goods sold . . . . .			<b>2</b>
	<b>3</b> Gross profit. Subtract line 2 from line 1c . . . . .			<b>3</b>
	<b>4</b> Ordinary income (loss) from other partnerships, estates, and trusts (attach statement) . . . . .			<b>4</b>
	<b>5</b> Net farm profit (loss) (attach Schedule F (Form 1040)) . . . . .			<b>5</b>
	<b>6</b> Net gain (loss) from Form 4797, Part II, line 17 (attach Form 4797) . . . . .			<b>6</b>
	<b>7</b> Other income (loss) (attach statement) . . . . .			<b>7</b>
<b>8</b> <b>Total income (loss).</b> Combine lines 3 through 7 . . . . .			<b>8</b>	
<b>Deductions</b> (see instructions for limitations)	<b>9</b> Salaries and wages (other than to partners) (less employment credits) . . . . .			<b>9</b>
	<b>10</b> Guaranteed payments to partners . . . . .			<b>10</b>
	<b>11</b> Repairs and maintenance . . . . .			<b>11</b>
	<b>12</b> Bad debts . . . . .			<b>12</b>
	<b>13</b> Rent . . . . .			<b>13</b>
	<b>14</b> Taxes and licenses . . . . .			<b>14</b>
	<b>15</b> Interest (see instructions) . . . . .			<b>15</b>
	<b>16a</b> Depreciation (if required, attach Form 4562) . . . . .	<b>16a</b>		
	<b>b</b> Less depreciation reported elsewhere on return . . . . .	<b>16b</b>		<b>16c</b>
	<b>17</b> Depletion ( <b>Don't</b> deduct oil and gas depletion.) . . . . .			<b>17</b>
	<b>18</b> Retirement plans, etc. . . . .			<b>18</b>
	<b>19</b> Employee benefit programs . . . . .			<b>19</b>
	<b>20</b> Other deductions (attach statement) . . . . .			<b>20</b>
<b>21</b> <b>Total deductions.</b> Add the amounts shown in the far right column for lines 9 through 20 . . . . .			<b>21</b>	
<b>22</b> <b>Ordinary business income (loss)</b> from trade or business activities. Subtract line 21 from line 8 . . . . .			<b>22</b>	
<b>Tax and Payment</b>	<b>23</b> Reserved for future use . . . . .			<b>23</b>
	<b>24</b> Reserved for future use . . . . .			<b>24</b>
	<b>25</b> Reserved for future use . . . . .			<b>25</b>
	<b>26</b> Reserved for future use . . . . .			<b>26</b>
	<b>27</b> Reserved for future use . . . . .			<b>27</b>
	<b>28</b> Reserved for future use . . . . .			<b>28</b>
	<b>29</b> Reserved for future use . . . . .			<b>29</b>
	<b>30</b> Reserved for future use . . . . .			<b>30</b>

**Schedule K Partners' Distributive Share Items**

				<b>Total amount</b>
<b>Income (Loss)</b>	<b>1</b> Ordinary business income (loss) (Schedule B, line 22) . . . . .			<b>1</b>
	<b>2</b> Net rental real estate income (loss) (attach Form 8825) . . . . .			<b>2</b>
	<b>3a</b> Other gross rental income (loss) . . . . .	<b>3a</b>		
	<b>b</b> Expenses from other rental activities (attach statement) . . . . .	<b>3b</b>		
	<b>c</b> Other net rental income (loss). Subtract line 3b from line 3a . . . . .			<b>3c</b>
	<b>4</b> Guaranteed payments: <b>a</b> Services <b>4a</b> <b>b</b> Capital <b>4b</b> . . . . .			
	<b>c</b> Total. Add line 4a and line 4b . . . . .			<b>4c</b>
	<b>5</b> Interest income . . . . .			<b>5</b>
	<b>6</b> Dividends and dividend equivalents: <b>a</b> Ordinary dividends . . . . .			<b>6a</b>
	<b>b</b> Qualified dividends . . . . .	<b>6b</b>		
	<b>c</b> Dividend equivalents . . . . .	<b>6c</b>		
<b>7</b> Royalties . . . . .			<b>7</b>	
<b>8</b> Net short-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>8</b>	
<b>9a</b> Net long-term capital gain (loss) (attach Schedule D (Form 1065)) . . . . .			<b>9a</b>	
<b>b</b> Collectibles (28%) gain (loss) . . . . .	<b>9b</b>			
<b>c</b> Unrecaptured section 1250 gain (attach statement) . . . . .	<b>9c</b>			
<b>10</b> Net section 1231 gain (loss) (attach Form 4797) . . . . .			<b>10</b>	
<b>11</b> Other income (loss) (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>11(2)</b>	
<b>Deductions</b>	<b>12</b> Section 179 deduction (attach Form 4562) . . . . .			<b>12</b>
	<b>13a</b> Contributions . . . . .			<b>13a</b>
	<b>b</b> Investment interest expense . . . . .			<b>13b</b>
	<b>c</b> Section 59(e)(2) expenditures: <b>(1)</b> Type <b>(2)</b> Amount			<b>13c(2)</b>
<b>d</b> Other deductions (see instructions) <b>(1)</b> Type <b>(2)</b> Amount			<b>13d(2)</b>	

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .			
4 Other increases (itemize): \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	

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

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

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

SCHEDULE O (Form 8865)

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

OMB No. 1545-1668

(Rev. October 2021) Department of the Treasury Internal Revenue Service

Attach to Form 8865. See the Instructions for Form 8865. Go to www.irs.gov/Form8865 for instructions and the latest information.

Name of transferor: CLAYTON, DUBILIER & RICE FUND X, LP; Filer's identifying number: 58-0633971; Name of foreign partnership: CLAYTON, DUBILIER & RICE FUND X, LP; EIN (if any): 98-1319473; Reference ID number (see instructions):

- 1a Is the partnership a section 721(c) partnership... See instructions... 1b If "Yes," was the gain deferral method applied... 2 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)?

Part I Transfers Reportable Under Section 6038B

Table with 8 columns: Type of property, (a) Date of transfer, (b) Description of property, (c) Fair market value on date of transfer, (d) Cost or other basis, (e) Recovery period, (f) Section 704(c) allocation method, (g) Gain recognized on transfer. Includes rows for Cash, Stock, notes receivable and payable, and other securities, Inventory, Tangible property used in trade or business, Intangible property described in section 197(f)(9), Intangible property, other than intangible property described in section 197(f)(9), Other property, and Totals.

3 Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

Supplemental Information Required To Be Reported (see instructions):

Part II Dispositions Reportable Under Section 6038B

Table with 8 columns: (a) Type of property, (b) Date of original transfer, (c) Date of disposition, (d) Manner of disposition, (e) Gain recognized by partnership, (f) Depreciation recapture recognized by partnership, (g) Gain allocated to partner, (h) Depreciation recapture allocated to partner.

Part III Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?

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

Schedule O (Form 8865) 10-2021

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  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1413550  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R WOLF HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1524441  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R HYDRA HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1395909  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R PISCES HOLDINGS LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1408846  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R DOCK HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1454328  
FOREIGN PARTNERSHIP: X



FORM 8865, PAGE 2 DETAIL

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

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NAME LINE 1: CD&R LOTUS HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1519941  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R MARINER HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1486163  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R PHOENIX HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1511706  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R BOSTON HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1513218  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R CHIP HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1539713  
FOREIGN PARTNERSHIP: X

FORM 8865, PAGE 2 DETAIL

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

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NAME LINE 1: CD&R SUNSHINE HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1541620  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R SMOKEY HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1541566  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R MERCURY HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1555663  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R HUNTER HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 98-1532358  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CD&R ARAWAK DL HOLDINGS, LP  
ADDRESS LINE 1: 375 PARK AVENUE, 18TH FLOOR  
CITY: NEW YORK  
STATE: NY  
ZIP: 10152  
ID: 37-1975579  
FOREIGN PARTNERSHIP: X

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

# 2022

Department of the Treasury  
Internal Revenue Service

Attach to your tax return.  
Go to [www.irs.gov/Form8865](http://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

Attachment Sequence No. **865**

Name of person filing this return: **ROBERT W. WOODRUFF ARTS CENTER, INC.** Filer's identification number: **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)): 1  2  3  4   
**B** Filer's tax year beginning 01/01/2022, and ending 12/31/2022

**C** Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:  
Name EIN  
Address

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions.

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership: **DENHAM COMMODITY PARTNERS FUND VI, LP**  
185 DARTMOUTH STREET, 7TH FLOOR  
BOSTON, MA 02116  
**2(a)** EIN (if any): 45-2484628  
**2(b)** Reference ID number (see instructions)  
**3** Country under whose laws organized: US

<b>4</b> Date of organization: 01/01/2021	<b>5</b> Principal place of business: US	<b>6</b> Principal business activity code number: 523900	<b>7</b> Principal business activity: INVESTMENTS	<b>8a</b> Functional currency: USD	<b>8b</b> Exchange rate (see instructions): 1.000000000000
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**H** Provide the following information for the foreign partnership's tax year:

**1** Name, address, and identification number of agent (if any) in the United States  
**2** Check if the foreign partnership must file:  Form 1042  Form 8804  Form 1065  
Service Center where Form 1065 is filed: EFILE  
**3** Name and address of foreign partnership's agent in country of organization, if any  
**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

**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  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)?  Yes  No  
**7** Were any special allocations made by the foreign partnership?  Yes  No  
**8** 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  
**10a** 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.  Yes  No  
**b** 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)?  Yes  No  
**11** Does this partnership meet both of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
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.  Yes  No

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions. Form **8865** (2022)



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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include Gross receipts or sales, Less returns and allowances, Cost of goods sold, Gross profit, Ordinary income, Net farm profit, Net gain, Other income, Total income, Salaries and wages, Guaranteed payments, Repairs and maintenance, Bad debts, Rent, Taxes and licenses, Interest, Depreciation, Depletion, Retirement plans, Employee benefit programs, Other deductions, Total deductions, Ordinary business income, Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include Ordinary business income, Net rental real estate income, Other gross rental income, Expenses from other rental activities, Other net rental income, Guaranteed payments, Interest income, Dividends and dividend equivalents, Royalties, Net short-term capital gain, Net long-term capital gain, Net section 1231 gain, Other income, Section 179 deduction, Contributions, Investment interest expense, Section 59(e)(2) expenditures, Other deductions.

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**Schedule L Balance Sheets per Books.** (Not required if Item H11, page 1, is answered "Yes.") (continued)

Table with 4 columns: (a) Beginning of tax year, (b) End of tax year, (c), (d). Rows include 13 Other assets, 14 Total assets, Liabilities and Capital, 15 Accounts payable, 16 Mortgages, notes, bonds payable in less than 1 year, 17 Other current liabilities, 18 All nonrecourse loans, 19 a Loans from partners, b Mortgages, notes, bonds payable in 1 year or more, 20 Other liabilities, 21 Partners' capital accounts, 22 Total liabilities and capital.

**Schedule M Balance Sheets for Interest Allocation**

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include 1 Total U.S. assets, 2 Total foreign assets: a Passive category, b General category, 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.")

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include 1 Net income (loss) per books, 2 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): \$, 3 Guaranteed payments (other than health insurance), 4 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 \$, 5 Add lines 1 through 4, 6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize): a Tax-exempt interest \$, 7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$, 8 Add lines 6 and 7, 9 Income (loss). Subtract line 8 from line 5.

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include 1 Balance at beginning of tax year, 2 Capital contributed: a Cash, b Property, 3 Net income (loss) per books, 4 Other increases (itemize): \$, 5 Add lines 1 through 4, 6 Distributions: a Cash, b Property, 7 Other decreases (itemize): \$, 8 Add lines 6 and 7, 9 Balance at end of tax year. Subtract line 8 from line 5.

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

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

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



**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor DENHAM COMMODITY PARTNERS FUND VI, LP		Filer's identifying number 58-0633971
Name of foreign partnership DENHAM COMMODITY PARTNERS FUND VI, LP	EIN (if any) 45-2484628	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  Yes  No
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  No
- 2** 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

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		219,209.				
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							
<b>Totals</b>			219,209.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer % (b) After the transfer %

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  Yes  No

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

Schedule O (Form 8865) 10-2021

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

**2022**

Department of the Treasury  
Internal Revenue Service

Attach to your tax return.  
Go to [www.irs.gov/Form8865](http://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

Attachment Sequence No. **865**

Name of person filing this return: **ROBERT W. WOODRUFF ARTS CENTER, INC.** Filer's identification number: **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)):  
1  2  3  4   
**B** Filer's tax year beginning 06/01/2022, and ending 05/31/2023

**C** Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

**D** If filer is a member of a consolidated group but not the parent, enter the following information about the parent:  
Name EIN  
Address

**E** Check if any excepted specified foreign financial assets are reported on this form. See instructions.

**F** Information about certain other partners (see instructions)

(1) Name	(2) Address	(3) Identification number	(4) Check applicable box(es)		
			Category 1	Category 2	Constructive owner

**G1** Name and address of foreign partnership: **DIGITAL ALPHA FUND A, LP**  
3535 EXECUTIVE TERMINAL DRIVE STE 110  
HENDERSON, NV 89052  
**2(a)** EIN (if any): **98-1350432**  
**2(b)** Reference ID number (see instructions)  
**3** Country under whose laws organized: **CJ**

<b>4</b> Date of organization: 06/05/2017	<b>5</b> Principal place of business: CJ	<b>6</b> Principal business activity code number: 523900	<b>7</b> Principal business activity: INVESTING	<b>8a</b> Functional currency: USD	<b>8b</b> Exchange rate (see instructions): 1.000000000000
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**H** Provide the following information for the foreign partnership's tax year:

**1** Name, address, and identification number of agent (if any) in the United States  
**2** Check if the foreign partnership must file:  
 Form 1042  Form 8804  Form 1065  
Service Center where Form 1065 is filed: **EFILE**

**3** Name and address of foreign partnership's agent in country of organization, if any: **STMT 1**  
**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  
**MAPLES CORPORATE SERVICES LIMITED**

- 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  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)?  Yes  No
- 7** Were any special allocations made by the foreign partnership?  Yes  No
- 8** 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
- 10a** 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.  Yes  No
- b** 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)?  Yes  No
- 11** Does this partnership meet **both** of the following requirements?  
1. The partnership's total receipts for the tax year were less than \$250,000.  
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.  Yes  No



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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include: 1a Gross receipts or sales, 1b Less returns and allowances, 2 Cost of goods sold, 3 Gross profit, 4 Ordinary income (loss) from other partnerships, 5 Net farm profit (loss), 6 Net gain (loss) from Form 4797, 7 Other income (loss), 8 Total income (loss), 9 Salaries and wages, 10 Guaranteed payments to partners, 11 Repairs and maintenance, 12 Bad debts, 13 Rent, 14 Taxes and licenses, 15 Interest, 16a Depreciation, 16b Less depreciation reported elsewhere, 17 Depletion, 18 Retirement plans, etc., 19 Employee benefit programs, 20 Other deductions, 21 Total deductions, 22 Ordinary business income (loss), 23-30 Reserved for future use.

Schedule K Partners' Distributive Share Items

Table with columns for Income (Loss) and Deductions. Rows include: 1 Ordinary business income (loss), 2 Net rental real estate income (loss), 3a Other gross rental income (loss), 3b Expenses from other rental activities, 3c Other net rental income (loss), 4 Guaranteed payments (a Services, b Capital), 5 Interest income, 6 Dividends and dividend equivalents (a Ordinary dividends, b Qualified dividends, c Dividend equivalents), 7 Royalties, 8 Net short-term capital gain (loss), 9a Net long-term capital gain (loss), 9b Collectibles (28%) gain (loss), 9c Unrecaptured section 1250 gain, 10 Net section 1231 gain (loss), 11 Other income (loss), 12 Section 179 deduction, 13a Contributions, 13b Investment interest expense, 13c(2) Section 59(e)(2) expenditures, 13d(2) Other deductions.

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**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	
	(a)	(b)	(c)	(d)
13 Other assets (attach statement) . . .				
14 Total assets . . . . .				
<b>Liabilities and Capital</b>				
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 . . . . .				

**Schedule M Balance Sheets for Interest Allocation**

	(a) Beginning of tax year	(b) End of tax year
1 Total U.S. assets . . . . .		
2 Total foreign assets:		
a Passive category . . . . .		
b General category . . . . .		
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.")

1 Net income (loss) per books . .		6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize):	
2 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): \$ _____		a Tax-exempt interest \$ _____	
3 Guaranteed payments (other than health insurance) . . . . .		7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize):	
4 Expenses recorded on books this tax year not included on Schedule K, lines 1 through 13d, and 21 (itemize):		a Depreciation \$ _____	
a Depreciation \$ _____			
b Travel and entertainment \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Income (loss). Subtract line 8 from line 5 . . . . .	

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

1 Balance at beginning of tax year		6 Distributions: a Cash . . . . .	
2 Capital contributed:		b Property. . . . .	
a Cash . . . . .		7 Other decreases (itemize): \$ _____	
b Property . . . . .			
3 Net income (loss) per books . .			
4 Other increases (itemize): \$ _____		8 Add lines 6 and 7. . . . .	
5 Add lines 1 through 4. . . . .		9 Balance at end of tax year. Subtract line 8 from line 5 . . . . .	

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

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

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

**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor <b>DIGITAL ALPHA FUND A, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>DIGITAL ALPHA FUND A, LP</b>	EIN (if any) <b>98-1350432</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions  Yes  **No**
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  Yes  **No**
- 2** 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**

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on 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 in section 197(f)(9)							
Other property							
<b>Totals</b>			185,561.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer **2.530 %** (b) After the transfer **1.981 %**

**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)?  Yes  **No**

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

Schedule O (Form 8865) 10-2021

JSA

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**PUBLIC INSPECTION COPY**



FORM 8865, PAGE 1 DETAIL  
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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

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SCHEDULE A-3 - AFFILIATION SCHEDULE

-----

NAME LINE 1: DA CLOUD HOLDINGS, LLC  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 98-1414746  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CITIES DIGITAL INFRASTRUCTURE, LLC  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 84-3722404

NAME LINE 1: CONNECTED FUTURE, LLC  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 84-1789181

NAME LINE 1: DA SAFETY SOLUTIONS I, LP  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 98-1589850  
FOREIGN PARTNERSHIP: X

NAME LINE 1: DIGITAL ALPHA SOLUTIONS FUND, LP  
ADDRESS LINE 1: 3535 EXECUTIVE TERMIAL DR, STE 110  
CITY: HENDERSON  
STATE: NV  
ZIP: 89052  
ID: 98-1681558  
FOREIGN PARTNERSHIP: X

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

2022

Department of the Treasury Internal Revenue Service

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

Attachment Sequence No. 865

Name of person filing this return: ROBERT W. WOODRUFF ARTS CENTER, INC. Filer's identification number: 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)): 1 [ ] 2 [ ] 3 [X] 4 [ ] B Filer's tax year beginning 01/01/2022, and ending 12/31/2022

C Filer's share of liabilities: Nonrecourse \$ Qualified nonrecourse financing \$ Other \$

D If filer is a member of a consolidated group but not the parent, enter the following information about the parent: Name EIN Address

E Check if any excepted specified foreign financial assets are reported on this form. See instructions. [ ]

F Information about certain other partners (see instructions)

Table with 4 columns: (1) Name, (2) Address, (3) Identification number, (4) Check applicable box(es) (Category 1, Category 2, Constructive owner)

G1 Name and address of foreign partnership: DRAGONEER OPPORTUNITIES FUND VI, LP 1 LETTERMAN DRIVE, BLDG D, STE M500 SAN FRANCISCO, CA 94129 2(a) EIN (if any): 98-1618627 2(b) Reference ID number (see instructions) 3 Country under whose laws organized: CJ

4 Date of organization: 08/10/2021 5 Principal place of business: CJ 6 Principal business activity code number: 523900 7 Principal business activity: INVESTMENTS 8a Functional currency: USD 8b Exchange rate (see instructions): 1.000000000000

H Provide the following information for the foreign partnership's tax year:

1 Name, address, and identification number of agent (if any) in the United States 2 Check if the foreign partnership must file: [ ] 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 organization, if any 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: STMT 1 PAT ROBERTSON

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 [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)? [ ] Yes [X] No

7 Were any special allocations made by the foreign partnership? [ ] Yes [X] No

8 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? LIMITED PARTNERSHIP

10a 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 [ ] Yes [X] No

b 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)? [ ] Yes [ ] No

11 Does this partnership meet both of the following requirements? 1. The partnership's total receipts for the tax year were less than \$250,000. 2. The value of the partnership's total assets at the end of the tax year was less than \$1 million. [ ] Yes [X] No 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)

- 12a Is the filer of this Form 8865 claiming a foreign-derived intangible income (FDII) deduction...
b Enter the amount of gross receipts derived from all sales of general property...
c Enter the amount of gross receipts derived from all sales of intangible property...
d Enter the amount of gross receipts derived from all services provided...
13 Enter the number of foreign partners subject to section 864(c)(8)...
14 At any time during the tax year were any transfers between the partnership and its partners subject to the disclosure requirements...

Sign Here Only if You're Filing This Form Separately and Not With Your Tax Return. Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Paid Preparer Use Only. Print/Type preparer's name, Preparer's signature, Date, Check self-employed, PTIN, Firm's name, Firm's EIN, Firm's address, Phone no.

Schedule A Constructive Ownership of Partnership Interest. Check the boxes that apply to the filer. If you check 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.

Table with 5 columns: Name, Address, Identification number (if any), Check if foreign person, Check if direct partner. Includes checkboxes for direct and constructive interest.

Schedule A-1 Certain Partners of Foreign Partnership (see instructions)

Table with 4 columns: Name, Address, Identification number (if any), Check if foreign person.

Schedule A-2 Foreign Partners of Section 721(c) Partnership (see instructions)

Table with 6 columns: Name of foreign partner, Address, Country of organization (if any), U.S. taxpayer identification number (if any), Check if related to U.S. transferor, Percentage interest (Capital, Profits).

Does the partnership have any other foreign person as a direct partner? Yes No

Schedule A-3 Affiliation Schedule. List all partnerships (foreign or domestic) in which the foreign partnership owns a direct interest or indirectly owns a 10% interest.

Table with 5 columns: Name, Address, EIN (if any), Total ordinary income or loss, Check if foreign partnership.

**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.

Table with columns for Income, Deductions, and Tax and Payment. Rows include: 1a Gross receipts or sales, 1b Less returns and allowances, 2 Cost of goods sold, 3 Gross profit, 4 Ordinary income (loss) from other partnerships, 5 Net farm profit (loss), 6 Net gain (loss) from Form 4797, 7 Other income (loss), 8 Total income (loss), 9 Salaries and wages, 10 Guaranteed payments to partners, 11-15 Various expenses, 16a-16b Depreciation, 17 Depletion, 18-21 Other deductions, 22 Ordinary business income (loss), 23-30 Reserved for future use.

**Schedule K Partners' Distributive Share Items**

Table with columns for Income (Loss) and Deductions. Rows include: 1 Ordinary business income (loss), 2 Net rental real estate income (loss), 3a-3c Other gross rental income (loss), 4 Guaranteed payments (Services/Capital), 5 Interest income, 6 Dividends and dividend equivalents, 7 Royalties, 8 Net short-term capital gain (loss), 9a-9c Net long-term capital gain (loss), 10 Net section 1231 gain (loss), 11 Other income (loss), 12 Section 179 deduction, 13a-13d Contributions and other deductions.

<b>Schedule K Partners' Distributive Share Items (continued)</b>		<b>Total amount</b>
<b>Self-Employment</b>	<b>14a</b> Net earnings (loss) from self-employment. . . . .	<b>14a</b>
	<b>b</b> Gross farming or fishing income. . . . .	<b>14b</b>
	<b>c</b> Gross nonfarm income. . . . .	<b>14c</b>
<b>Credits</b>	<b>15a</b> Low-income housing credit (section 42(j)(5)). . . . .	<b>15a</b>
	<b>b</b> Low-income housing credit (other) . . . . .	<b>15b</b>
	<b>c</b> Qualified rehabilitation expenditures (rental real estate) (attach Form 3468) . . . . .	<b>15c</b>
	<b>d</b> Other rental real estate credits (see instructions) Type _____	<b>15d</b>
	<b>e</b> Other rental credits (see instructions) Type _____	<b>15e</b>
	<b>f</b> Other credits (see instructions) Type _____	<b>15f</b>
<b>International</b>	<b>16</b> Attach Schedule K-2 (Form 8865), Partners' Distributive Share Items - International, and check this box to indicate that you are reporting items of international tax relevance. . . . . <input type="checkbox"/>	
<b>Alternative Minimum Tax (AMT) items</b>	<b>17a</b> Post-1986 depreciation adjustment. . . . .	<b>17a</b>
	<b>b</b> Adjusted gain or loss. . . . .	<b>17b</b>
	<b>c</b> Depletion (other than oil and gas). . . . .	<b>17c</b>
	<b>d</b> Oil, gas, and geothermal properties - gross income. . . . .	<b>17d</b>
	<b>e</b> Oil, gas, and geothermal properties - deductions . . . . .	<b>17e</b>
	<b>f</b> Other AMT items (attach statement) . . . . .	<b>17f</b>
<b>Other Information</b>	<b>18a</b> Tax-exempt interest income . . . . .	<b>18a</b>
	<b>b</b> Other tax-exempt income . . . . .	<b>18b</b>
	<b>c</b> Nondeductible expenses. . . . .	<b>18c</b>
	<b>19a</b> Distributions of cash and marketable securities. . . . .	<b>19a</b>
	<b>b</b> Distributions of other property. . . . .	<b>19b</b>
	<b>20a</b> Investment income. . . . .	<b>20a</b>
	<b>b</b> Investment expenses. . . . .	<b>20b</b>
<b>c</b> Other items and amounts (attach statement)		
<b>21</b> Total foreign taxes paid or accrued . . . . .	<b>21</b>	

<b>Schedule L Balance Sheets per Books. (Not required if Item H11, page 1, is answered "Yes.")</b>				
<b>Assets</b>	Beginning of tax year		End of tax year	
	(a)	(b)	(c)	(d)
<b>1</b> Cash . . . . .				
<b>2a</b> Trade notes and accounts receivable. . . . .				
<b>b</b> Less allowance for bad debts . . . . .				
<b>3</b> Inventories . . . . .				
<b>4</b> U.S. Government obligations. . . . .				
<b>5</b> Tax-exempt securities . . . . .				
<b>6</b> Other current assets (attach statement)				
<b>7a</b> Loans to partners (or persons related to partners) . . . . .				
<b>b</b> Mortgage and real estate loans . . . . .				
<b>8</b> Other investments (attach statement)				
<b>9a</b> Buildings and other depreciable assets				
<b>b</b> Less accumulated depreciation. . . . .				
<b>10a</b> Depletable assets . . . . .				
<b>b</b> Less accumulated depletion . . . . .				
<b>11</b> Land (net of any amortization) . . . . .				
<b>12a</b> Intangible assets (amortizable only) . . . . .				
<b>b</b> Less accumulated amortization. . . . .				

**Schedule L Balance Sheets per Books.** (Not required if Item H11, page 1, is answered "Yes.") (continued)

Table with 4 columns: (a) Beginning of tax year, (b) Beginning of tax year, (c) End of tax year, (d) End of tax year. Rows include: 13 Other assets, 14 Total assets, Liabilities and Capital, 15 Accounts payable, 16 Mortgages, notes, bonds payable in less than 1 year, 17 Other current liabilities, 18 All nonrecourse loans, 19 a Loans from partners, b Mortgages, notes, bonds payable in 1 year or more, 20 Other liabilities, 21 Partners' capital accounts, 22 Total liabilities and capital.

**Schedule M Balance Sheets for Interest Allocation**

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Total U.S. assets, 2 Total foreign assets: a Passive category, b General category, 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.")

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Net income (loss) per books, 2 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): \$, 3 Guaranteed payments (other than health insurance), 4 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 \$, 5 Add lines 1 through 4, 6 Income recorded on books this tax year not included on Schedule K, lines 1 through 11 (itemize): a Tax-exempt interest \$, 7 Deductions included on Schedule K, lines 1 through 13d, and 21, not charged against book income this tax year (itemize): a Depreciation \$, 8 Add lines 6 and 7, 9 Income (loss). Subtract line 8 from line 5.

**Schedule M-2 Analysis of Partners' Capital Accounts.** (Not required if Item H11, page 1, is answered "Yes.")

Table with 2 columns: (a) Beginning of tax year, (b) End of tax year. Rows include: 1 Balance at beginning of tax year, 2 Capital contributed: a Cash, b Property, 3 Net income (loss) per books, 4 Other increases (itemize): \$, 5 Add lines 1 through 4, 6 Distributions: a Cash, b Property, 7 Other decreases (itemize): \$, 8 Add lines 6 and 7, 9 Balance at end of tax year. Subtract line 8 from line 5.

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

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

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



**SCHEDULE O**  
**(Form 8865)**

(Rev. October 2021)  
Department of the Treasury  
Internal Revenue Service

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

▶ **Attach to Form 8865. See the Instructions for Form 8865.**  
▶ **Go to [www.irs.gov/Form8865](http://www.irs.gov/Form8865) for instructions and the latest information.**

OMB No. 1545-1668

Name of transferor <b>DRAGONEER OPPORTUNITIES FUND VI, LP</b>		Filer's identifying number <b>58-0633971</b>
Name of foreign partnership <b>DRAGONEER OPPORTUNITIES FUND VI, LP</b>	EIN (if any) <b>98-1618627</b>	Reference ID number (see instructions)

- 1 a** Is the partnership a section 721(c) partnership (as defined in Regulations section 1.721(c)-1T(b)(14))?  
See instructions . . . . .  **Yes**  **No**
- b** If "Yes," was the gain deferral method applied to avoid the recognition of gain upon the contribution of property?  **Yes**  **No**
- 2** 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**

**Part I Transfers Reportable Under Section 6038B**

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Recovery period	(f) Section 704(c) allocation method	(g) Gain recognized on transfer
Cash	12/31/2022		314,420.				
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							
<b>Totals</b>			314,420.				

**3** Enter the transferor's percentage interest in the partnership: (a) Before the transfer **NONE** % (b) After the transfer **0.672** %  
**Supplemental Information Required To Be Reported** (see instructions):

**Part II Dispositions Reportable Under Section 6038B**

(a) Type of property	(b) Date of original transfer	(c) Date of disposition	(d) Manner of disposition	(e) Gain recognized by partnership	(f) Depreciation recapture recognized by partnership	(g) Gain allocated to partner	(h) Depreciation recapture allocated to partner

**Part III** Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or section 904(f)(5)(F)? . . . . .  **Yes**  **No**

For Paperwork Reduction Act Notice, see the Instructions for Form 8865. Schedule O (Form 8865) 10-2021

FORM 8865, PAGE 1 DETAIL

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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
ZIP:	94129

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SCHEDULE A-3 - AFFILIATION SCHEDULE

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NAME LINE 1: BESTIE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 98-1671322  
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  
ZIP: 94129  
ID: 98-1619783  
FOREIGN PARTNERSHIP: X

NAME LINE 1: CASING DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-1507810

NAME LINE 1: CONVERSE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-2302205

NAME LINE 1: CURRANT DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-1478080

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

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NAME LINE 1: FACTORIAL DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-4672559

NAME LINE 1: INFLUENCE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-1992075

NAME LINE 1: KHALEESI DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-4215489

NAME LINE 1: LATITUDE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-3281801

NAME LINE 1: LYCHEE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-3857128

NAME LINE 1: METROID DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129

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

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ID: 86-1437064

NAME LINE 1: MIRROR DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-4019274

NAME LINE 1: OASIS FD HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-4306346

NAME LINE 1: PINWHEEL DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-4695989

NAME LINE 1: PRODUCTIVE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-4425469

NAME LINE 1: REIMAGINE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 87-4285165

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

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NAME LINE 1: RESOLUTE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 85-3698341

NAME LINE 1: REVITALIZE DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-0968792

NAME LINE 1: SATURN FD HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-3690823

NAME LINE 1: SHELF DF HOLDINGS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 98-1651536  
FOREIGN PARTNERSHIP: X

NAME LINE 1: SPIKE FD INVESTMENTS, LP  
ADDRESS LINE 1: 1 LETTERMAN DRIVE, BLDG D, STE M500  
CITY: SAN FRANCISCO  
STATE: CA  
ZIP: 94129  
ID: 88-1747263

NAME LINE 1: TICKET DF HOLDINGS, LP

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

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ADDRESS LINE 1:	1 LETTERMAN DRIVE, BLDG D, STE M500
CITY:	SAN FRANCISCO
STATE:	CA
ZIP:	94129
ID:	88-1409793