**Exempt Organization Business Income Tax Return** Form 990-T (and proxy tax under section 6033(e)) For calendar year 2014 or other tax year beginning JUL 1, 2014, and ending JUN 30, 2015 Information about Form 990-T and its instructions is available at www.irs.gov/form990t. Department of the Treasury Internal Revenue Service ▶ Do not enter SSN numbers on this form as it may be made public if your organization is a 501(c)(3) DEmployer identification number (Employees' trust, see instructions.) Name of organization ( Check box if name changed and see instructions.) Check box if address changed 13-1770307 B Exempt under section JOHN & MARY R. MARKLE FOUNDATION Print E Unrelated business activity codes (See instructions.) Number, street, and room or suite no. If a P.O. box, see instructions. X 501(c)(3) Type \_408(e) \_\_\_\_220(e) 10 ROCKEFELLER PLAZA City or town, state or province, country, and ZIP or foreign postal code 408A 530(a) 525990 7529(a) NEW YORK, NY 10020 C Book value of all assets F Group exemption number (See instructions.) Other trust 141, 121, 456. G Check organization type X 501(c) corporation 501(c) trust \_\_\_\_ 401(a) trust H Describe the organization's primary unrelated business activity. > SEE STATEMENT 9 X No During the tax year, was the corporation a subsidiary in an affiliated group or a parent-subsidiary controlled group? If "Yes," enter the name and identifying number of the parent corporation. J The books are in care of ► THE FOUNDATION Telephone number ► 212-489-6655 (C) Net (A) Income (B) Expenses Part I Unrelated Trade or Business Income 1a Gross receipts or sales c Balance 10 b Less returns and allowances 2 2 Cost of goods sold (Schedule A, line 7) Gross profit. Subtract line 2 from line 1c 3 318,995. 318,995. 4a 4a Capital gain net income (attach Schedule D) 4b b Net gain (loss) (Form 4797, Part II, line 17) (attach Form 4797) 4c c Capital loss deduction for trusts 86,712. 86,712. STMT 11 Income (loss) from partnerships and S corporations (attach statement) 5 Rent income (Schedule C) 6 6 7 Unrelated debt-financed income (Schedule E) 7 Interest, annuities, royalties, and rents from controlled organizations (Sch. F) 8 8 Investment income of a section 501(c)(7), (9), or (17) organization (Schedule G) 9 Exploited exempt activity income (Schedule I) 10 10 Advertising income (Schedule J) 11 Other income (See instructions; attach schedule) 405,707. 405,707. Total. Combine lines 3 through 12 13 Deductions Not Taken Elsewhere (See instructions for limitations on deductions.) (Except for contributions, deductions must be directly connected with the unrelated business income.) 14 Compensation of officers, directors, and trustees (Schedule K) 14 15 Salaries and wages 15 16 16 Repairs and maintenance 17 17 Bad debts Interest (attach schedule) SEE STATEMENT 12 12,944. 18 18 24,128. Taxes and licenses SEE STATEMENT 10 19 19 31,411. Charitable contributions (See instructions for limitation rules) SEE STATEMENT 14 20 20 Depreciation (attach Form 4562) 21 22b Less depreciation claimed on Schedule A and elsewhere on return 22 23 23 Depletion 24 Contributions to deferred compensation plans 24 25 Employee benefit programs 25 26 Excess exempt expenses (Schedule I) 26 27 Excess readership costs (Schedule J) 27 Other deductions (attach schedule) SEE STATEMENT 13 53,528. 28 28 122,011. 29 Total deductions, Add lines 14 through 28 29 283,696. 30 Unrelated business taxable income before net operating loss deduction. Subtract line 29 from line 13 30 Net operating loss deduction (limited to the amount on line 30) 31 31 283,696. 32 Unrelated business taxable income before specific deduction. Subtract line 31 from line 30 32 33 1,000. Specific deduction (Generally \$1,000, but see line 33 instructions for exceptions) 33 Unrelated business taxable income. Subtract line 33 from line 32. If line 33 is greater than line 32, enter the smaller of zero or 282,696. 34

Form 990-T (2014)

line 32

423701 01-13-15

LHA For Paperwork Reduction Act Notice, see instructions.

EXTENDED TO MAY 16, 2016

10.00		lax Computation									
	35 (	Organizations Taxable as Corpor	ations. See ins	structions for tax o	computat	tion.				17	
	(	Controlled group members (section	ins 1561 and 1	1563) check here		See instructi	ons and:				
	a E	Enter your share of the \$50,000, \$	25,000, and \$	9,925,000 taxable	income	brackets (in tha	nt order):				
	(	1) \$	(2) \$			(3)  \$					
	b E	enter organization's share of: (1)	Additional 5%	tax (not more than	1 \$11,75	0)  \$					
	(	2) Additional 3% tax (not more th	ian \$100,000)			\$		1			
		ncome tax on the amount on line								35c	93,501.
		rusts Taxable at Trust Rates. Se									
		Tax rate schedule or	Schedule D (I	Form 1041)						36	
	37 F	Proxy tax. See instructions								37	
		Alternative minimum tax								38	
_	39 T	otal. Add lines 37 and 38 to line 3	35c or 36, whic	chever applies						39	93,501.
P		Tax and Payments									
	40a F	oreign tax credit (corporations att	ach Form 111	8; trusts attach Fo	rm 1116	)	40a				
		Other credits (see instructions)									
		General business credit. Attach For									
		redit for prior year minimum tax (									
		otal credits. Add lines 40a throug								40e	
		ubtract line 40e from line 39								41	93,501.
	42 0	other taxes. Check if from: Fo	orm 4255 🗔	Form 8611	Form	8697 Fo	rm 8866	Other (attach sci	nedule)	42	•
		otal tax. Add lines 41 and 42								43	93,501.
	44 a P	ayments: A 2013 overpayment c	redited to 2014	4	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		44a	58,	723.		
		014 estimated tax payments									
		ax deposited with Form 8868									
		oreign organizations: Tax paid or						_			
		ackup withholding (see instruction									
		redit for small employer health ins							- 3		
	٦	Form 4136		Form 2439 Other		Total	► 44g				
	45 T	otal payments. Add lines 44a thro	unt 44a				779			45	58,723.
		stimated tax penalty (see instructi								46	30,7230
		ax due. If line 45 is less than the t								47	34,778.
		verpayment. If line 45 is larger th								48	31/1/00
		nter the amount of line 48 you wa						Refunded		49	
P		Statements Regardi					nation (see			75	
1		time during the 2014 calendar ye							cial acc	ount (bank	Yes No
		ties, or other) in a foreign country									100 110
		nts. If YES, enter the name of the						portorrologne	unik und	i i manolai	Х
2	During	the tax year, did the organization receive see instructions for other forms the orga	a a distribution fr	om, or was it the gran	ntor of, or t	ransferor to, a fore	eign trust?	100000000000000000000000000000000000000	hacane	compensations.	_ <u> </u>
3		the amount of tax-exempt interest	-				****************				
		le A - Cost of Goods S					N/A		-		
1		ory at beginning of year	1						91	6	
2	Purcha		2			ost of goods so					
3		f labor	3	-		om line 5. Enter				7	
4 a		nal section 263A costs (att. schedule)	4a			o the rules of se					Yes No
h		costs (attach schedule)	4b					for resale) apply	to		103 110
5		Add lines 1 through 4b	5			e organization?					
		Under penalties of perjury, I declare the correct, and complete. Declaration of	at I have examine	ed this return, includi						rledge and bel	lief, it is true,
Sig	n	correct, and complete. Declaration of	preparer (other th	an taxpayer) is based	on all info	ormation of which	preparer has an	y knowledge.			
He	re	Muln ()	buc	4 4/14/	16	Mana	enel)	4/50			uss this return with wn below (see
		Signature of officer	100	Date	10	Title	1// 200	7610	_	tructions)?	
		Print/Type preparer's name		Preparer's sign	ature		Date	Check	if		1103
_		r init i po proputor o natile			)	ho			1.55	1 1114	
Pa		THOMAS BLANEY		C) L		HS.	3/29/	10   2011-0111	noyeu	DUU.	234022
	epare	- DVE O	'CONNOI	R DAVIES	, LL	P	1	Firm's E	INI 🕨		1728945
US	e On	665		AVENUE	,			FIIIIS	.IIV	£ 1	1,20545
		Firm's address ► NEW			2			Dhone	20 2	12-284	6-2600
		7 2,21						1 FIIOHEI	IU. Z.	20	2000

Schedule C - Rent Inc	come (F	rom Real Prop	erty an	d Personal	Proper	rty Leas	ed With Real P	rope	erty)(see instructions)	
1. Description of property										
(1)										
(2)										
(3)								**		
(4)										
	2	2. Rent received or accr	ued							
(a) From personal property rent for personal prope 10% but not more	rty is more tha	ntage of (b)	of rent for	and personal prope personal property e nt is based on profi	xceeds 50%	rcentage or if			nnected with the income in (b) (attach schedule)	
(1)									-	
(2)		A .								
(3)										
(4)								ESC		
Total		O . Total				0.				
(c) Total income. Add totals of c						0	(b) Total deductions Enter here and on page	1	0	
here and on page 1, Part I, line 6			(	1 1 1		0.	Part I, line 6, column (B)	>	0	
Schedule E - Unrelate	a pept-	Financed incol	ne (see	instructions)		- 1	0.0			
				2. Gross in	come from		<ol><li>Deductions directly to debt-fir</li></ol>	connect nanced p	ted with or allocable property	
1. Description	of debt-financ	ced property		or allocabl financed	le to debt-	(a)	Straight line depreciation (attach schedule)		(b) Other deductions (attach schedule)	
(1)								-		
(2)										
(3)										
(4)										
4. Amount of average acquisition	4. Amount of average acquisition debt on or allocable to debt-financed 5. Average adjusting of or allocal		cable to by column ed property				7. Gross income reportable (column 2 x column 6)		8. Allocable deductions (column 6 x total of columns 3(a) and 3(b))	
(1)					0	%				
(2)		- 5 - 100				%				
(3)						%				
(4)						%		-		
(4)		_			,	1	iter here and on page 1,		Enter here and on page 1,	
						Р	art I, line 7, column (A).	13	Part I, line 7, column (B).	
Totals								0.	0 .	
Total dividends-received deduc	tions includ	ded in column 8	*******						0.	
Schedule F - Interest,	Annuitie	es, Royalties, a	nd Rei	nts From C	ontrolle	ed Organ	nizations (see in	nstruct	tions)	
			Exemp	ot Controlled C	rganizatio	ons	*			
1. Name of controlled organiza	ation	<b>2.</b> Employer identification number	Net u (loss) (	3. nrelated income (see instructions)		4. of specified nents made	5. Part of column 4 that is included in the controlling organization's gross incom		6. Deductions directly connected with income in column 5	
(1)										
(2)										
(3)										
(4)								- 16		
Nonexempt Controlled Organ	izations			-						
7. Taxable Income	8. Net	unrelated income (loss) see instructions)	<b>9.</b> To	otal of specified pay made	ments	in the cont	olumn 9 that is included rolling organization's oss income		Deductions directly connected with income in column 10	
(1)										
(2)										
(3)								· =		
(4)								8-		
\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	1	180	1 .			Enter here a	olumns 5 and 10. and on page 1, Part I, 8, column (A).	I	Add columns 6 and 11. er here and on page 1, Part I, line 8, column (B).	
						mie				
Totals							0.		0.	

Schedule G - Investr					ganization	13-1//030	7 Page
	escription of income			2. Amount of income	3. Deductions directly connected (attach schedule)	4. Set-asides (attach schedule)	5. Total deductions and set-asides (col. 3 plus col. 4)
(1)					•		(esperation of the second of
(2)							
(3)							
(4)							
				Enter here and on page 1, Part I, line 9, column (A).		1.00	Enter here and on page Part I, line 9, column (B)
Totals				0.			0
Schedule I - Exploite (see ins	ed Exempt Activity structions)	y income	e, Othe	r Than Advertisir	ng Income		
1. Description of exploited activity	2. Gross unrelated business income from trade or business	3. Expe directly co with prod of unrel business	nnected luction ated	4. Net income (loss) from unrelated trade or business (column 2 minus column 3). If a gain, compute cols. 5 through 7.	5. Gross income from activity that is not unrelated business income	6. Expenses attributable to column 5	7. Excess exempt expenses (column 6 minus column 5, but not more than column 4).
(1)							
(2)			T i				
(3)							
(4)							
	Enter here and on page 1, Part I, line 10, col. (A).	Enter here page 1, I line 10, c	Part I, ol. (B).				Enter here and on page 1, Part II, line 26.
Schedule J - Advertis	0.	7. II.	0.				0
Part I Income From	n Periodicals Rep	orted on	a Con	solidated Basis			
1. Name of periodical	2. Gross advertising income		Direct ising costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)							
(2)							
(3)							
(4)							
Totals (carry to Part II, line (5))		0.	0	•			0
Part II Income From	Periodicals Repo	orted on	a Sepa	arate Basis (For ea	ach periodical liste	d in Part II, fill in	
1. Name of periodical	2. Gross advertising income	3.	Direct sing costs	4. Advertising gain or (loss) (col. 2 minus col. 3). If a gain, compute cols. 5 through 7.	5. Circulation income	6. Readership costs	7. Excess readership costs (column 6 minus column 5, but not more than column 4).
(1)		1 -12-					
(2)	-						
(3)		X=2-				-	-
(4)							
Totals from Part I	<b>D</b> (	0.	0				0.
ougis IIVIII Fait I	Enter here and o page 1, Part I, line 11, col. (A).	n Enter h	ere and on 1, Part I, I, col. (B).	•			Enter here and on page 1, Part II, line 27.
Totals, Part II (lines 1-5)	•	0.	0				0.
Schedule K - Compe	nsation of Officer	s, Direct	ors, an	d Trustees (see in	structions)		
	Name			2. Title	3. Percer time devot busines	ed to	ensation attributable elated business
(1)						%	
(2)						%	
(3)						%	<del>-</del>
(4)		* **					
	Dort II line 14			-		%	^
Total. Enter here and on page 1,	ram II, IINe 14		concentration				0.

JOHN & MARY R. MARKLE FOUNDATION EIN #: 13-1770307 JUNE 30, 2015

### Organization's Primary Unrelated Business Activity

The John & Mary R. Markle Foundation is an organization exempt from federal income tax pursuant to Internal Revenue Code ("Code") section 501(c)3. The Foundation is, however subject to the unrelated business income tax imposed under Code section 512 on any unrelated trade or business income. The unrelated business income ("UBI") of the Foundation was generated from several investments in limited partnerships. UBI is allocated to each state based upon amounts directly reported on the Schedule K-1's received from each limited partnership.

JOHN & MARY R. MARKLE FOUNDATION TAXES AND LICENSES FORM 990-T, PART II - LINE 19 JUNE 30, 2015

### STATE INCOME TAXES DEDUCTED IN COMPUTING FEDERAL TAXABLE INCOME

NEW YORK	\$22,584
ARIZONA	50
GEORIGA	355
VIRGINA	101
NORTH CAROLINA	1,038
	\$ 24,128

	(LOSS) FROM PARTNERSHIPS AND S CORPORATIONS	STATEMENT 11
DESCRIPTION		AMOUNT
2006 SPECIAL GLOBAL OPPORT BAUPOST VALUE PARTNERS, INTERIOR COMMONFUND CAPITAL INTERIOR COMMONFUND CAPITAL VENTUR COMMONFUND CAPITAL VENTUR COMMONFUND CAPITAL VENTUR COMMONFUND PRIVATE EQUITY ENCAP FLATROCK MIDSTREAM ENDOWMENT CAPITAL VENTUR ENDOWMENT PRIVATE EQUITY HARVEST MLP INCOME FUND ROCKEFELLER ACCESS FUND ROCKEFELLER ACCESS FUND ROCKEFELLER SPECIAL GLOBA LLC TIFF PARTNERS III, LLC TIFF PARTNERS IV, LLC TIFF PRIVATE EQUITY PARTN TIFF PRIVATE EQUITY PARTN TIFF PRIVATE EQUITY PARTN TIFF REALTY & RESOURCES IN TIFF REALTY & RESOURCES IN TOTAL TO FORM 990-T, PAGE	LP NATIONAL PARTNERS IV, LP RE PARTNERS VI, LP RE PARTNERS VII, LP RE PARTNERS VIII, LP RE PARTNERS X, LP Y V, LP Y VI, LP Y VIII, LP Y VIII, LP FUND III, LP E PARTNERS V, LP PARTNERS IV, LP II LLC II, LLC II, LLC III, LC III, LLC	819. 32,080. 108. <203.> 261. <66.> <762.> 3,248. 1,466. <2,185.> <34.> <17,223.> <64.> 523. 13. 938. <10,686.>  1,171. 1,013. 18,236. 745. <3,404.> <1,577.> 64,276. <1,981.>
10 10 10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	. 1, 11111 3	=======================================
FORM 990-T	INTEREST PAID	STATEMENT 12
DESCRIPTION		AMOUNT
2006 SPECIAL GLOBAL OPPOR BAUPOST VALUE PARTNERS, I COMMONFUND CAPITAL INTERN COMMONFUND CAPITAL PRIVAT COMMONFUND CAPITAL PRIVAT COMMONFUND CAPITAL PRIVAT COMMONFUND CAPITAL PRIVAT COMMONFUND CAPITAL VENTUR ROCKEFELLER ACCESS FUND 0 ROCKEFELLER ACCESS FUND 1	TATIONAL PARTNERS VI LP E EQUITY PARTNERS V LP E EQUITY PARTNERS VI LP E EQUITY PARTNERS VII LP E EQUITY PARTNERS VIII LP E PARTNERS X, LP 6-I LLC	1,800. 9,611. 12. 25. 51. 37. 87. 16. 254. 959.

JOHN & MARY R. MARKLE FOUNDATION	13-1770307
ROCKEFELLER SPECIAL GLOBAL OPPORTUNITIES DISTRESSED FUND, LLC TIFF PRIVATE EQUITY PARTNERS 2006 LLC TIFF PRIVATE EQUITY PARTNERS 2008 LLC TOTAL TO FORM 990-T, PAGE 1, LINE 18	4. 5. 83.
FORM 990-T OTHER DEDUCTIONS	STATEMENT 13
DESCRIPTION	AMOUNT
ACCOUNTING FEES OTHER K-1 EXPENSES	10,000. 43,528.
TOTAL TO FORM 990-T, PAGE 1, LINE 28	53,528.

ORM 990-T	CONTRIBUTIONS SUMMARY		STATEMENT	14
QUALIFIED CONTR	BUTIONS SUBJECT TO 100% LIMIT			
CARRYOVER OF PRIFOR TAX YEAR 2 FOR TAX YEAR 2 FOR TAX YEAR 2 FOR TAX YEAR 2 FOR TAX YEAR 2	2010 1,224,968 2011 1,470,184 2012 2,615,476			
TOTAL CARRYOVER FOTAL CURRENT YE	EAR 10% CONTRIBUTIONS	8,164,698		
TOTAL CONTRIBUTI FAXABLE INCOME I	ONS AVAILABLE IMITATION AS ADJUSTED	8,164,698 31,411		
EXCESS 10% CONTR EXCESS 100% CONT FOTAL EXCESS CON	RIBUTIONS	8,133,287 0 8,133,287		
ALLOWABLE CONTRI	BUTIONS DEDUCTION		31,	411
TOTAL CONTRIBUTI	ON DEDUCTION		31,	411

### SCHEDULE D (Form 1120)

Department of the Treasury Internal Revenue Service

Capital Gains and Losses

► Attach to Form 1120, 1120-C, 1120-F, 1120-FSC, 1120-H, 1120-IC-DISC, 1120-L, 1120-ND, 1120-PC, 1120-POL, 1120-REIT, 1120-RIC, 1120-SF, or certain Forms 990-T.
► Information about Schedule D (Form 1120) and its separate instructions is at www.irs.gov/form1120.

OMB No. 1545-0123

Name

Employer identification number

JOHN & MARY R. MARKLE FOUNDATION

13-1770307

Part I Short-Term Capital Ga	ins and Losses - As	sets Held One Yea	r or Less		
See instructions for how to figure the amounts to enter on the lines below.	(d) Proceeds	(e) Cost	(g) Adjustments to ga or loss from Form(s) 89	ain 49.	(h) Gain or (loss). Subtract column (e) from column (d) and
This form may be easier to complete if you round off cents to whole dollars.	(sales price)	(or other basis)	Part I, line 2, column (	(g)	combine the result with column (g)
Totals for all short-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 1b					
1b Totals for all transactions reported on					
Form(s) 8949 with Box A checked					
2 Totals for all transactions reported on					
Form(s) 8949 with Box B checked					
3 Totals for all transactions reported on					
Form(s) 8949 with Box C checked					253.
4 Short-term capital gain from installment sales	from Form 6252, line 26 or 37	***************************************		4	
5 Short-term capital gain or (loss) from like-kind	exchanges from Form 8824			5	
6 Unused capital loss carryover (attach computa				6	( )
7 Net short-term capital gain or (loss). Combine				7	253.
Part II Long-Term Capital Gain	ns and Losses - Ass	ets Held More Tha	an One Year		W 4277 (O-7277)
See instructions for how to figure the amounts	(d)	(a)	(a)		(h) a :
to enter on the lines below.  This form may be easier to complete if you round off cents to whole dollars.	Proceeds (sales price)	(e) Cost (or other basis)	(g) Adjustments to ga or loss from Form(s) 89- Part II, line 2, column (	in 49, g)	(h) Gain or (loss). Subtract column (e) from column (d) and combine the result with column (g)
8a Totals for all long-term transactions reported on Form 1099-B for which basis was reported to the IRS and for which you have no adjustments (see instructions). However, if you choose to report all these transactions on Form 8949, leave this line blank and go to line 8b					
8b Totals for all transactions reported on					5.00
Form(s) 8949 with Box D checked			4		
9 Totals for all transactions reported on					
Form(s) 8949 with Box E checked		F			
10 Totals for all transactions reported on					
Form(s) 8949 with <b>Box F</b> checked					107,208.
11 Enter gain from Form 4797, line 7 or 9				11	211,534.
12 Long-term capital gain from installment sales	from Form 6252, line 26 or 37			12	
13 Long-term capital gain or (loss) from like-kind	exchanges from Form 8824			13	
14 Capital gain distributions				14	
15 Net long-term capital gain or (loss). Combine				15	318,742.
Part III Summary of Parts I and	111		Commission of the commission o		
16 Enter excess of net short-term capital gain (line	e 7) over net long-term capital	loss (line 15)		16	253.
17 Net capital gain. Enter excess of net long-term				17	318,742.
18 Add lines 16 and 17. Enter here and on Form				18	318,995.
Note. If losses exceed gains, see Capital losse					

For Paperwork Reduction Act Notice, see the Instructions for Form 1120.

Schedule D (Form 1120) (2014)

JWA

Department of the Treasury Internal Revenue Service

### Sales and Other Dispositions of Capital Assets

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

OMB No. 1545-0074

Name(s) shown on return

Social security number or taxpayer identification no.

13-1770307

JOHN & MARY R. MARKLE FOUNDATION Before you check Box A, B, or C below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B.

Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later). Short-Term. Transactions involving capital assets you held 1 year or less are short-term. For long-term transactions, see page 2. Note. You may aggregate all short-term transactions reported on Form(s) 1099 B showing basis was reported to the IRS and for which no adjustments or codes are required. Enter the total directly on Schedule D, line 1a; you are not required to report these transactions on Form 8949 (see instructions). You must check Box A, B, or C below. Check only one box. If more than one box applies for your short-term transactions, complete a separate Form 8949, page 1, for each applicable box. If you have more short-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (A) Short-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (B) Short-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS X (C) Short-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or (c) (d) loss. If you enter an amount Description of property Proceeds Cost or other Gain or (loss). Date sold or Date acquired in column (g), enter a code in column (f). See instructions. (sales price) (Example: 100 sh. XYZ Co.) basis. See the Subtract column (e) (Mo., day, yr.) disposed Note below and from column (d) & (Mo., day, yr.) (g) Amount of see Column (e) in combine the result Code(s) the instructions with column (g) adjustment ROCKEFELLER SPECIAL GLOBAL **OPPORTUNITIES** DISTRESSED FUND, LLC VARIOUS VARIOUS 55. ROCKEFELLER ACCESS FUND I, LLC VARIOUS VARIOUS 46. TIFF PRIVATE **EQUITY PARTNERS** 2006, LLC VARIOUS VARIOUS <6.> TIFF PRIVATE EQUITY PARTNERS 2008, LLC VARIOUS VARIOUS <6.> BAUPOST VALUE PARTNERS, LP - IV VARIOUS VARIOUS 90. COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS V, LP VARIOUS VARIOUS 72. COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VI, LP VARIOUS VARIOUS <1. COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP VARIOUS VARIOUS 3.

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

2 Totals. Add the amounts in columns (d), (e), (g) and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 1b (if Box A above is checked), line 2 (if Box B above is checked), or line 3 (if Box C above is checked)

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side

Social security number or taxpayer identification no.

### JOHN & MARY R. MARKLE FOUNDATION

13-1770307

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later).

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

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

You must check Box D, E, or F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (F) Long-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or (d) (h) (a) (b) (c) (e) loss. If you enter an amount Proceeds Description of property Cost or other Gain or (loss). Date acquired Date sold or in column (g), enter a code in column (f). See instructions. (sales price) basis. See the Subtract column (e) (Example: 100 sh. XYZ Co.) (Mo., day, yr.) disposed from column (d) & Note below and (Mo., day, yr.) (g) see Column (e) in combine the result Amount of Code(s) with column (g) the instructions adjustment ROCKEFELLER SPECIAL GLOBAL **OPPORTUNITIES** DISTRESSED FUND, VARIOUS VARIOUS 265. LLC ROCKEFELLER ACCESS <124.> FUND I, LLC VARIOUS VARIOUS TIFF PARTNERS IV, LLC VARIOUS 2,212. VARIOUS TIFF REALTY & RESOURCES II, LLC 88,097. VARIOUS VARIOUS TIFF PRIVATE **EQUITY PARTNERS** 2006, LLC VARIOUS VARIOUS <140.> TIFF REALTY & RESOURCES III, LLCVARIOUS VARIOUS 389. TIFF PRIVATE **EQUITY PARTNERS** 2008, LLC VARIOUS VARIOUS 8,949. BAUPOST VALUE VARIOUS 6,792. PARTNERS, LP - IV VARIOUS COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS V, LP VARIOUS VARIOUS 57. COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VI, LP VARIOUS VARIOUS <210.> COMMONFUND CAPITAL PRIVATE EQUITY PARTNERS VII, LP VARIOUS VARIOUS 399. Totals. Add the amounts in columns (d), (e), (g) and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 8b (if Box D above is checked), line 9 (if Box E 107,208. above is checked), or line 10 (if Box F above is checked)

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

Page 2

Name(s) shown on return. Name and SSN or taxpayer identification no. not required if shown on other side

Social security number or taxpayer identification no.

### JOHN & MARY R. MARKLE FOUNDATION

13-1770307

Before you check Box D, E, or F below, see whether you received any Form(s) 1099-B or substitute statement(s) from your broker. A substitute statement will have the same information as Form 1099-B. Either may show your basis (usually your cost) even if your broker did not report it to the IRS. Brokers must report basis to the IRS for most stock you bought in 2011 or later (and for certain debt instruments you bought in 2014 or later).

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

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You must check Box D, E, or F below. Check only one box. If more than one box applies for your long-term transactions, complete a separate Form 8949, page 2, for each applicable box. If you have more long-term transactions than will fit on this page for one or more of the boxes, complete as many forms with the same box checked as you need. (D) Long-term transactions reported on Form(s) 1099-B showing basis was reported to the IRS (see Note above) (E) Long-term transactions reported on Form(s) 1099-B showing basis was not reported to the IRS (F) Long-term transactions not reported to you on Form 1099-B Adjustment, if any, to gain or (a) (b) (c) (d) (e) (h) loss. If you enter an amount Proceeds Description of property Cost or other Gain or (loss). Date acquired Date sold or in column (g), enter a code in column (f). See instructions. (sales price) (Example: 100 sh. XYZ Co.) basis. See the Subtract column (e) (Mo., day, yr.) disposed Note below and from column (d) & (Mo., day, yr.) see Column (e) in combine the result Amount of Code(s) the instructions with column (g) adjustment COMMONFUND CAPITAL VENTURE PARTNERS VII, LP VARIOUS VARIOUS 522. Totals. Add the amounts in columns (d), (e), (g) and (h) (subtract negative amounts). Enter each total here and include on your Schedule D, line 8b (if Box D above is checked), line 9 (if Box E

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

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

Department of the Treasury Internal Revenue Service Sales of Business Property

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

▶ Attach to your tax return.

OMB No. 1545-0184 2014

Attachment Sequence No. 27

Form 4797 (2014)

Identifying number

Name(s) shown on return

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

JOHN & MARY R. MARKLE FOUNDATION 13-1770307 1 Enter the gross proceeds from sales or exchanges reported to you for 2014 on Form(s) 1099-B or 1099-S (or substitute statement) that you are including on line 2, 10, or 20 Part Sales or Exchanges of Property Used in a Trade or Business and Involuntary Conversions From Other Than Casualty or Theft-Most Property Held More Than 1 Year (see instructions) (e) Depreciation (f) Cost or other (g) Gain or (loss) (a) Description (b) Date acquired (C) Date sold (d) Gross sales allowed or basis, plus Subtract (f) from the improvements and of property (mo., day, yr.) (mo., day, yr.) price allowable since sum of (d) and (e) acquisition expense of sale SEE STATEMENT 15 211,534. Gain, if any, from Form 4684, line 39 3 3 Section 1231 gain from installment sales from Form 6252, line 26 or 37 4 Section 1231 gain or (loss) from like-kind exchanges from Form 8824 5 5 Gain, if any, from line 32, from other than casualty or theft 6 211,534. Combine lines 2 through 6. Enter the gain or (loss) here and on the appropriate line as follows: 7 Partnerships (except electing large partnerships) and S corporations. Report the gain or (loss) following the instructions for Form 1065, Schedule K, line 10, or Form 1120S, Schedule K, line 9. Skip lines 8, 9, 11, and 12 below. Individuals, partners, S corporation shareholders, and all others. If line 7 is zero or a loss, enter the amount from line 7 on line 11 below and skip lines 8 and 9. If line 7 is a gain and you did not have any prior year section 1231 losses, or they were recaptured in an earlier year, enter the gain from line 7 as a long term capital gain on the Schedule D filed with your return and skip lines 8, 9, 11, and 12 below. Nonrecaptured net section 1231 losses from prior years (see instructions) 8 8 Subtract line 8 from line 7. If zero or less, enter -0-. If line 9 is zero, enter the gain from line 7 on line 12 below. If line 9 is more than zero, enter the amount from line 8 on line 12 below and enter the gain from line 9 as a long-term 211,534. capital gain on the Schedule D filed with your return (see instructions) Part II Ordinary Gains and Losses (see instructions) 10 Ordinary gains and losses not included on lines 11 through 16 (include property held 1 year or less): Loss, if any, from line 7 11 Gain, if any, from line 7 or amount from line 8, if applicable 12 12 13 Gain, if any, from line 31 13 Net gain or (loss) from Form 4684, lines 31 and 38a 14 14 15 Ordinary gain from installment sales from Form 6252, line 25 or 36 15 Ordinary gain or (loss) from like-kind exchanges from Form 8824 16 16 17 Combine lines 10 through 16 17 18 For all except individual returns, enter the amount from line 17 on the appropriate line of your return and skip lines a and b below. For individual returns, complete lines a and b below: a If the loss on line 11 includes a loss from Form 4684, line 35, column (b)(ii), enter that part of the loss here. Enter the part of the loss from income-producing property on Schedule A (Form 1040), line 28, and the part of the loss from property used as an employee on Schedule A (Form 1040), line 23. Identify as from "Form 4797, line 18a." 18a b Redetermine the gain or (loss) on line 17 excluding the loss, if any, on line 18a. Enter here and on 18b

LHA For Paperwork Reduction Act Notice, see separate instructions.

						(h) Data a militar	(10.1
19 (	a) Description of section 1245, 1250, 1252, 1254,	or 1255	property:			(b) Date acquired (mo., day, yr.)	(c) Date sold (mo., day, yr.)
Α							
В							
С							
D			w				
	hese columns relate to the properties on						
	nes 19A through 19D.		Property A	Property	B	Property C	Property D
	ross sales price (Note: See line 1 before completing.)	20					
	Cost or other basis plus expense of sale	21				4	
	Depreciation (or depletion) allowed or allowable	22					
	djusted basis. Subtract line 22 from line 21	23					
	otal gain. Subtract line 23 from line 20	24					
	epreciation allowed or allowable from line 22	25a					
	inter the smaller of line 24 or 25a	25b		-	_	-	
	section 1250 property: If straight line depreciation	230					
W	as used, enter -0- on line 26g, except for a corporation ubject to section 291.					**	
a A	dditional depreciation after 1975 (see instructions)	26a					4
<b>b</b> A	pplicable percentage multiplied by the smaller f line 24 or line 26a (see instructions)	26b					
р	ubtract line 26a from line 24. If residential rental roperty <b>or</b> line 24 is not more than line 26a, skipnes 26d and 26e	26c		N.			
d A	dditional depreciation after 1969 and before 1976	26d					
e E	nter the <b>smaller</b> of line 26c or 26d	26e					
f S	ection 291 amount (corporations only)	26f					
	dd lines 26b, 26e, and 26f	26g					
7 If di a	section 1252 property: Skip this section if you did not spose of farmland or if this form is being completed for partnership (other than an electing large partnership).						
	oil, water, and land clearing expenses	27a					-
	ne 27a multiplied by applicable percentage	27b		<u> </u>			
	nter the smaller of line 24 or 27b section 1254 property:	27c			_	1	
a In	section 1234 property: tangible drilling and development costs, expenditures r development of mines and other natural deposits, ining exploration costs, and depletion (see instructions)	28a					
	nter the <b>smaller</b> of line 24 or 28a	28b					
a Ai	section 1255 property: pplicable percentage of payments excluded om income under section 126 (see instructions)	29a					9
	nter the smaller of line 24 or 29a (see instructions)	29b					
	mary of Part III Gains. Complete property c	,	A through D through	line 20h hefere	aoina	to line 20	
uiiii		Olul III IS	A tillough D tillough	ilile 230 Deloie	going	to line 30.	
) To	otal gains for all properties. Add property columns	A throu	gh D, line 24			30	
	dd property columns A through D, lines 25b, 26g,						
	ubtract line 31 from line 30. Enter the portion from		y or theft on Form 46	84, line 33. Ente	er the		
	om other than casualty or theft on Form 4797, line  Recapture Amounts Under Section		and 280F(b)(2)	When Busin	1000	Use Drops to 50	% or less
10 TH	(see instructions)	113	2 dila 2001 (D/(2)	THISH DUSII	1033	Coe Propo to ou	70 OI LC33
	,					(a) Section 179	(b) Section 280F(b)(2)
3 Se	ection 179 expense deduction or depreciation allo	wable in	prior years	i i	33		
	ecomputed depreciation (see instructions)				34		
	ecapture amount. Subtract line 34 from line 33. Se				35		

FORM 4797	PR	OPERTY HE	LD MORE THAN	ONE YEAR	STA	ATEMENT 15
DESCRIPTION	DATE ACQUIRED	DATE SOLD	SALES PRICE	DEPR.	COST OR BASIS	GAIN OR LOSS
ROCKEFELLER ACCESS FUND 06-I, LLC	VARIOUS	VARIOUS				<9.
2006 SPECIAL GLOBAL	VARIOUS	VARIOUS				
OPPORTUNITIES, ROCKEFELLER ACCESS FUND I,	VARIOUS	VARIOUS				<7.
LLC ROCKEFELLER SPECIAL GLOBAL	VARIOUS	VARIOUS				<10.
OPPORTUNITIES FIFF PARTNERS IV, LLC	VARIOUS	VARIOUS				8. 980.
TIFF REALTY & RESOURCES II, LLC	VARIOUS	VARIOUS				10,779.
TIFF PRIVATE EQUITY PARTNERS 2006, LLC	VARIOUS	VARIOUS				17.
TIFF REALTY & RESOURCES III,	VARIOUS	VARIOUS				E 0E1
LC TIFF PRIVATE QUITY PARTNERS	VARIOUS	VARIOUS				5,251.
008, LLC AUPOST VALUE PARTNERS, LP - IV	VARIOUS	VARIOUS				1,823. 192,525.
OMMONFUND APITAL PRIVATE	VARIOUS	VARIOUS				
QUITY PARTNERS OMMONFUND APITAL PRIVATE	VARIOUS	VARIOUS				1.
QUITY PARTNERS OMMONFUND APITAL PRIVATE	VARIOUS	VARIOUS				<1.
QUITY PARTNERS OMMONFUND APITAL PRIVATE	VARIOUS	VARIOUS				12.
QUITY PARTNERS NDOWMENT VENTURE	VARIOUS	VARIOUS				<6.
ARTNERS V, LP OMMONFUND APITAL VENTURE	VARIOUS	VARIOUS				113.
ARTNERS VII, LP						58.
OTAL TO 4797, PAR	RT I, LINE	2				211,534.

(Rev. January 2014)

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

OMB No. 1545-1709

Department of the Treasury Internal Revenue Service File a separate application for each return.

▶ Information about Form 8868 and its instructions is at www.irs.gov/form8868

	are illing for an Automatic 3-Month Extension, comple					
	are filing for an Additional (Not Automatic) 3-Month Ex					
	complete Part II unless you have already been granted					
	nic filing (e-file). You can electronically file Form 8868 if y					
	to file Form 990-T), or an additional (not automatic) 3-mo					
	o file any of the forms listed in Part I or Part II with the ex-					
	Benefit Contracts, which must be sent to the IRS in pap		(see instructions). For more details	on the elec	tronic filing of t	his form,
	v.irs.gov/efile and click on e-file for Charities & Nonprofits					
Part I						
A corpor	ation required to file Form 990-T and requesting an autor	matic 6-mo	onth extension - check this box and	complete		ightharpoonup X
Part I on						🔼
	corporations (including 1120-C filers), partnerships, REM come tax returns.	ICs, and t	rusts must use Form 7004 to reque			number
				1.	r's identifying	
Type or	Name of exempt organization or other filer, see instru	ctions.		Employer	identification i	number (EIN) or
print	JOHN & MARY R. MARKLE FOUNI	וחדיים	N		13-1770	307
File by the			LEVEL TO THE REAL PROPERTY OF THE PERTY OF T	Social sec	curity number (	Lange and Market
due date fo filing your	Number, street, and room or suite no. If a P.O. box, s 10 ROCKEFELLER PLAZA	Oociai sec	only namber (	5011)		
retum. See Instructions		oreign add	Iress, see instructions.			
-	NEW TORK, NT 10020					12 1-07-107
Enter the	e Return code for the return that this application is for (file	e a separa	te application for each return)			0 7
Applicat	tion	Return	Application			Return
ls For		Code	Is For			Code
	0 or Form 990-EZ	01	Form 990-T (corporation)			07
Form 99		02	Form 1041-A			08
Form 47	20 (individual)	03	Form 4720 (other than individual)			09
Form 99	0-PF	04	Form 5227	-11.7		10
Form 99	0-T (sec. 401(a) or 408(a) trust)	05	Form 6069			11
Form 99	0-T (trust other than above)	06	Form 8870			12
	THE FOUNDATION			0000		
	nooks are in the care of   10 ROCKEFELLER	PLAZ	A - NEW YORK, NY I	0020		
	hone No. ► 212-489-6655		Fax No. $\triangleright$ 212-765-96			
	organization does not have an office or place of business					
<ul><li>If this</li></ul>	is for a Group Return, enter the organization's four digit					
box >	. If it is for part of the group, check this box				ers the extension	on is for.
1   re	equest an automatic 3-month (6 months for a corporation MAY 15, 2016 , to file the exemp		to file Form 990-1) extension of time tion return for the organization nam		The extension	
lo :	for the organization's return for:	organiza	don return for the organization ham	ed above.	THE EXTENSION	
<b>&gt;</b>						
3.0	X tax year beginning JUL 1, 2014	an	d ending JUN 30, 2015			
	tax your boginning					
2 If t	the tax year entered in line 1 is for less than 12 months, c	heck reas	on: Initial return	Final return	n	
	Change in accounting period					
3a If t	this application is for Forms 990-BL, 990-PF, 990-T, 4720	, or 6069,	enter the tentative tax, less any			
	nrefundable credits. See instructions.			3a	\$	58,723.
_	this application is for Forms 990-PF, 990-T, 4720, or 6069	, enter an	y refundable credits and			
	timated tax payments made. Include any prior year overp			3b	\$	58,723.
	alance due. Subtract line 3b from line 3a. Include your pa					•
by	using EFTPS (Electronic Federal Tax Payment System).	See instru	ctions.	3c	\$	0.
Caution	. If you are going to make an electronic funds withdrawal	(direct de	bit) with this Form 8868, see Form	3453-EO an	d Form 8879-E	O for payment

instructions.

# Return of U.S. Persons With Respect to Certain Foreign Partnerships Attach to your tax return. Information about Form 8865 and its separate instructions is at www.irs.gov/form8865. Information furnished for the foreign partnership's tax year

Attachment

Department of the Treasury Internal Revenue Service

beginning , and ending

OMB No. 1545-1668

Internal Revenue			inning	, and	ending				Sequence No.	118
Name of person	filing this	return			File	er's identifyi	ng number			
JOHN & MA	ARY R	. MARKLE FO	UNDATION	I		1	3-17703	07		N-1-725
		not filing this form with			of filer (see Cate	gories of File	rs in the instr	uctions and check	applicable box	(es)):
10 ROCKE	FELLE	R PLAZA		1	2	3	X	4		
NEW YORK	, NY	10020		B Filer's tax	year beginning	77		, and ending		
C Filer's sha	re of liab	ilities: Nonrecourse	\$	NONEQualified r	-	nancing \$	N	ONE Other \$	N	ONE
		of a consolidated		the parent, enter	the following in	formation ab	out the pare	nt:		
Name					EIN					
Address										
E Informatio	n about	certain other partne	rs (see instruc	ctions)						
					Washington and a second			(4) Che	eck applicable bo	
	(1) Nar	ne		(2) Address		(3) Identify	ing number	Category 1	Category 2	Constructive owner
F1 Name and	address	of foreign partners	nip					2(a) EIN (if ar	ıy)	
CIP4 AIV	LP							98-11895	56	
C/O CERBE	ERUS (	CAPITAL MAN	AGEMENT,	LP				2(b) Reference	ce ID number (	(see instr.)
190 ELGIN										
GEORGE TO	TAINI (	GRAND CAYMAN	I. CAYMA	N TSLANDS.	KY1-9005			3 Country und	der whose law	vs organized
GEORGE TO	, , , , , , , , , , , , , , , , , , ,	DIGHT CHILL	, 01111111	. 101111007				CAYMAN I	SLANDS	
4 Date of		5 Principal place of	of 6 Prin	ncipal business vity code number	7 Principa activity	al business	8a Funct	ional currency	8b Exchang	
organizatio	on	business	acti	vity code flumber	activity				(000 1110	
9/1/2014		NEW YORK	5239	900	INVEST	MENTS	USD		1	
		ng information for t								
		nd identifying numb	er of agent (if	any) in the	2 Check i	f the foreign	partnership		-	
United Sta	ites					orm 1042			X Form 106	5 or 1065-B
N/A					Service	Center where	Form 1065 or	r 1065-B is filed:		
					OGDEN,					
		of foreign partner	ship's agent in	country of	4 Name a	nd address	of person(s)	with custody of nip, and the loca	f the books and ation of such b	d ooks
organizatio	on, it any				and rec	ords, if differ	ent	inp, and the local		
						-				
N/A								AGEMENT,	$^{\mathrm{LP}}$	
					-7.7	GIN AVE				0005
								CAYMAN ISLA		
5 Were any	special	allocations made by	the foreign pa	artnership?					^ Yes	No
6 Enter the	number	of Forms 8858, Int	ormation Retu	rn of U.S. Persons	vvitn Respect	o Foreign Di	sregarded E	nuues,		
		turn (see instruction							NONE	
		rship classified und							PARTNERSHI	
8a Does the file	er have ar	n interest in the foreign	n partnership, o	r an interest indirectly	y through the for	eign partnersh	ip, that is a s	eparate N / A ⊾	V	□ Na
unit under F	Reg. 1.150	3(d)-1(b)(4) or part of	a combined se	parate unit under Reg.	. 1.1503(d)-1(b)	(4)(ii)? If "No,"	skip question	8b	Yes	No No
		eparate unit or combine hip meet <b>both</b> of the			ited loss as define	ed in Reg. 1.15	03(d)-1(b)(5)(	11)? ▶	Yes	No
<ul> <li>The pa</li> </ul>	artnersh	in's total receipts for	or the tax year	were less than \$25	50,000 and		) N/	A	□ v <sub>**</sub>	No
<ul> <li>The value</li> </ul>	alue of th	ne partnership's tot	al assets at th	ne end of the tax yes	ar was less tha	n \$1 million.			Yes	□ NO
	o not cor	nplete Schedules L nalties of perjury, I de	, M-1, and M-2	2.	- 11		dulas and ata	tomante and to th	ne heet of my kn	owledge
Only If You	and belief	f, it is true, correct, ar	id complete. D	eclaration of preparer	n, including accol (other than gene	eral partner or I	imited liability	company member	r) is based on all	owicage
This Form Separately	informatio	on of which preparer h	as any knowled	ge.						
and Not With Your Tax	Ciana	ture of general partne	r or limited liabi	lity company member			Date			
Return.	•		or minuted habi		ntura		,	Check	if PTIN	
Paid	rint/Type	preparer's name		Preparer's signa	ature		Date	self-emp		
Proparer								Firm's El		
Han Only	irm's nam							Phone no		
F	irm's addr	ess						i Holle He	50.5	

1- oru	1 8865 (2014)					l age 🚐
Sc	hedule A	Constructive O box b, enter the interest you con	wnership of Partnership Interest. Check e name, address, and U.S. taxpayer identistructively own. See instructions.	the boxes that apply fying number (if any)	to the filer. If of the persor	you check n(s) whose
		a Owns a dire	ct interest b X	Owns a constructive inte	rest	Check if
	3	Name	Address	Identifying number (if any	Check if foreign	direct
2006 CDECTAL CLODAL		CTODAT	C/O ROCKEFELLER & CO., INC. 20	0-4684455	person	partitei
2006 SPECIAL GLOBAL OPPORTUNITIES, LLC			10 ROCKEFELLER PLAZA, THIRD FL	0 1001133		
<u> </u>	LOKIOWIII	507 1110	NEW YORK, NY 10020			
_						
Sc	hedule A-1	Certain Partners	of Foreign Partnership (see instructions)	)		Check if
		Name	Address	Identifying number	(if any)	foreign person
_						
_	11					
Doe	s the partners	ship have any other	foreign person as a direct partner?		Yes	No
Sc	hedule A-2		dule. List all partnerships (foreign or dome	estic) in which the for	eign partnersh	nip owns a
		direct interest or	indirectly owns a 10% interest.	EIN	Total ordinary	Check if
		Name	Address	(if any)	income or loss	foreign partnership
Co	hedule B	Incomo Statomo	ent - Trade or Business Income			<u></u>
Cau	ition. Include o	only trade or busines	ss income and expenses on lines 1a through 22	below. See the instruct	ions for more int	formation.
				1c		
Ð	2 Cost of 3 Gross p	goods sold	from line 1c	3		
ncome			n other partnerships, estates, and trusts (attach s			
nc			h Schedule F (Form 1040))			
			1797, Part II, line 17 (attach Form 4797)			
			statement)			
			ne lines 3 through 7			
s)			irtners			
tion						
mita				40		
for II				13		
Suc						
ucti						
insti		ation (if required, at	10-			
see		preciation reported	16c			
us (			il and gas depletion.)			
oftio						
Deductions (see instructions for limitations)			atement)			
	Walter Cardenson			0.2000 72480.000		
-	21 Total de	eductions. Add the al	mounts shown in the far right column for lines 9 throu			
	22 0.11	, business income /le-	of from trade or business activities. Subtract line 21 f	rom line 8 22		

Page 3

Schedule K			Total amount	
	1	Ordinary business income (loss) (page 2, line 22)	1	
	2	Net rental real estate income (loss) (attach Form 8825)	2	
	3a	Other gross rental income (loss)		
	b	Expenses from other rental activities (attach statement) 3b		
	c	Other net rental income (loss). Subtract line 3b from line 3a	3c	
·	4	Guaranteed payments	4	
SSO	5	Interest income	5	
Ę	6	Dividends: a Ordinary dividends	6a	
Income (Loss)		b Qualified dividends		
03	7	Royalties	7	
<u>=</u>	8	Net short-term capital gain (loss) (attach Schedule D (Form 1065))	8	
	9a	Net long-term capital gain (loss) (attach Schedule D (Form 1065))		
	b	Collectibles (28%) gain (loss) 9b		
	С	Unrecaptured section 1250 gain (attach statement) 9c		
	10	Net section 1231 gain (loss) (attach Form 4797)	10	
	11	Other income (loss) (see instructions) Type ▶	11	
S	12	Section 179 deduction (attach Form 4562)	12	
Ö	13a			
rct	b	Investment interest expense		
Deductions	С	Section 59(e)(2) expenditures: (1) Type ▶ (2) Amount ▶	13c(2)	
	d		13d	
Self- Employ- ment	14a	Net earnings (loss) from self-employment	14a	
self ipple	b	Gross farming or fishing income	14b	
SI	С	Gross nonfarm income,	14c	
	15a	Low-income housing credit (section 42(j)(5))	15a	
w	b	Low-income housing credit (other)	15b	
dit.	С	Qualified rehabilitation expenditures (rental real estate) (attach Form 3468)	15c	
Credits	d	Other rental real estate credits (see instructions) Type ▶	15d	
0	е	Other rental credits (see instructions)  Type ▶	15e	
	f	Other credits (see instructions)  Type ▶	15f	
		Name of country or U.S. possession ▶		
	b	Gross income from all sources		
ü	C		16c	
ansactions		Foreign gross income sourced at partnership level	105	
Sa	d		161	
ran		Deductions allocated and apportioned at partner level	16h	
Tr	g	intologi expense i	1011	
ig		Deductions allocated and apportioned at partnership level to foreign source income	164	
Foreign	1	Passive category ▶ j General category ▶ k Other (attach statement) ▶  Total foreign taxes (check one): ▶ Paid Accrued	161	
ш	 		16m	
	m n	Other foreign tax information (attach statement)	Hard Commission Discourse Commission	
	17a		17a	
Alternative Minimum Tax (AMT) Items	b	Adjusted gain or loss	17b	
ati) Iter	C	Depletion (other than oil and gas)	17c	
m (-	d	Oil, gas, and geothermal properties - gross income	17d	
Anin	e	Oil, gas, and geothermal properties - deductions	17e	
, <b>5</b> 0	f	Other AMT items (attach statement)	17f	
	18a	Tax-exempt interest income	18a	
jo	b	Other tax-exempt income	18b	
nat	C	Nondeductible expenses	18c	
E O	19a	Distributions of cash and marketable securities	19a	
Other Information	b	Distributions of other property	19b	
	20 a	Investment income	20a	
	b	Investment expenses	20b	
	С	Other items and amounts (attach statement)		

Page 4

Form 8865 (2014)

Sch	edule L Balance Sheets per Bo	oks. (Not required if	ltem G9, page 1, is a	inswered "Yes.")	
		Beginning		End of ta	
	Assets	(a)	(b)	(c)	(d)
1	Cash				
2 a	Trade notes and accounts receivable				
b	Less allowance for bad debts				
3	Inventories				
4	U.S. government obligations				
5	Tax-exempt securities				
6	Other current assets (attach statement)				
7a	Loans to partners (or persons related to				
	partners)				
b	Mortgage and real estate loans				
8	Other investments (attach statement)				
9 a	Buildings and other depreciable assets	T = 2 = 221			
	Less accumulated depreciation				
	Depletable assets				
	Less accumulated depletion				
11	Land (net of any amortization)				
	Intangible assets (amortizable only)				
	Less accumulated amortization				
13	Other assets (attach statement)				
14	Total assets				
	Liabilities and Capital				
15	Accounts payable				
16	Mortgages, notes, bonds payable in less than 1 year				
17	Other current liabilities (attach statement)				
18	All nonrecourse loans				
19 a	Loans from partners (or persons related to partners)				
	Mortgages, notes, bonds payable in 1 year or more				
20	Other liabilities (attach statement)				
21	Partners' capital accounts				
22	Total liabilities and capital				
==_	Total naphilion and capital 1 1 1 1 1				Form 8865 (2014)

Sc	hedule M Balance Sheets for Interest A	llocation
		(a) (b)  Beginning of End of tax year tax year
1	Total U.S. assets	
2	Total foreign assets:	
а	Passive category	
	General category	
	Other (attach statement)	
	hedule M-1 Reconciliation of Income (Lo	oss) per Books With Income (Loss) per Return. (Not required if Item G9, pag
	1, is answered "Yes.")	
		6 Income recorded on books this
1	Net income (loss) per books	year not included on Schedule K,
2	Income included on Schedule K,	lines 1 through 11 (itemize):
	lines 1, 2, 3c, 5, 6a, 7, 8, 9a, 10,	a Tax-exempt interest \$
	and 11 not recorded on books	
	this year (itemize):	7 Deductions included on Schedule
3	Guaranteed payments (other	K, lines 1 through 13d, and 16l not
	than health insurance)	charged against book income this
4	Expenses recorded on books	year (itemize):
	this year not included on	a Depreciation \$
	Schedule K, lines 1 through	
	13d, and 16I (itemize):	
2	Depreciation \$	
	Travel and entertainment \$	8 Add lines 6 and 7
~	Traver and entertainment 4	9 Income (loss). Subtract line 8
5	Add lines 1 through 4	from line 5
	hedule M-2 Analysis of Partners' Capital	Accounts. (Not required if Item G9, page 1, is answered "Yes.")
1	Balance at beginning of year	6 Distributions: a Cash
2	Capital contributed:	b Property
2	a Cash	7 Other decreases (itemize):
	b Property	1 Other desired to the master than 1
2	Net income (loss) per books	
3		
4	Other increases (itemize):	8 Add lines 6 and 7
		9 Balance at end of year. Subtract
5	Add lines 1 through 4	line 8 from line 5
3	Add lines I tillough 4	Form <b>8865</b> (2014

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

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

	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	90 pr			
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				1-
16	Distributions paid				
17	Interest paid				
18	Other	<u> </u>			
19	Add lines 10 through 18				
20	Amounts borrowed (enter the maximum loan balance during the year). See				
21	instructions Amounts loaned (enter the maximum loan balance during the year). See instructions				Form <b>8865</b> (2014

### SCHEDULE OI

### Transfer of Property to a Foreign Partnership

OMB No. 1545-1668

(Form 8865)

(under section 6038B)

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

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

Department of the Treasury Internal Revenue Service Name of transferor Filer's identifying number JOHN & MARY R. MARKLE FOUNDATION 13-1770307 EIN (if any) Reference ID number (see instructions) Name of foreign partnership CIP4 AIV LP Part I Transfers Reportable Under Section 6038B (b) Number of (e) Section 704(c) allocation (g) Percentage interest (c) Fair market (a) Date of (d) Type of Cost or other Gain recognized on in partnership after value on date property items transfer basis transfer method transfer of transfer transferred Cash < 1% **VARIOUS** 199,963.00 Stock, notes receivable and payable, and other securities Inventory Tangible property used in trade or business Intangible property Other property Supplemental Information Required To Be Reported (see instructions): N/A Part II Dispositions Reportable Under Section 6038B (f) Depreciation (h) (b) (e) Gain (g) (c) Depreciation Date of recapture recognized by partnership Gain allocated Type of Date of Manner of recapture allocated recognized by original property disposition disposition to partner partnership to partner transfer Is any transfer reported on this schedule subject to gain recognition under section 904(f)(3) or Part III

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

Yes Schedule O (Form 8865) 2014

(Rev. December 2013)

Department of the Treasury Internal Revenue Service Return by a U.S. Transferor of Property to a Foreign Corporation

▶ Information about Form 926 and its separate instructions is at www.irs.gov/form926.
▶ Attach to your income tax return for the year of the transfer or distribution.

OMB No. 1545-0026

Attachment Sequence No. 128

Part I U.S. Transferor Information (see instructions)		
Name of transferor		Identifying number (see instructions)
JOHN & MARY R. MARKLE FOUNDATION		13-1770307
<ul> <li>If the transferor was a corporation, complete questions 1a through a lift the transfer was a section 361(a) or (b) transfer, was the transfer domestic corporations?</li> <li>Did the transferor remain in existence after the transfer?</li> <li>If not, list the controlling shareholder(s) and their identifying numbers.</li> </ul>	sferor controlled (under section	Yes No
Controlling shareholder	Ident	ifying number
	31	
3		
<ul> <li>c If the transferor was a member of an affiliated group filing a concorporation?</li> <li>If not, list the name and employer identification number (EIN) of</li> </ul>		
Name of parent corporation	EIN of pa	arent corporation
<ul> <li>d Have basis adjustments under section 367(a)(5) been made?</li> <li>2 If the transferor was a partner in a partnership that was the complete questions 2a through 2d.</li> <li>a List the name and EIN of the transferor's partnership:</li> </ul>		
Name of partnership	EIN o	f partnership
BAUPOST VALUE PARTNERS, LP - IV  b Did the partner pick up its pro rata share of gain on the transfer of the partner disposing of its entire interest in the partnership?  d Is the partner disposing of an interest in a limited partnership that		Yes X No
securities market?		Yes X No
Part II Transferee Foreign Corporation Information (see ins	structions)	
3 Name of transferee (foreign corporation) BVP-IV CAYMEN VIII LIMITED		4a Identifying number, if any FOREIGN
5 Address (including country) P.O. BOX 309, UGLAND HOUSE, SOUTH CHURCH STRE		4b Reference ID number (see instructions)
GEORGE TOWN, GRAND CAYMAN KY1-1104  6 Country code of country of incorporation or organization (see ins	structions)	BAUPOST 3
CJ 7 Foreign law characterization (see instructions)		
CORPORATION		
Is the transferee foreign corporation a controlled foreign corporation	tion?	X Yes No
For Paperwork Reduction Act Notice, see separate instructions.		Form <b>926</b> (Rev. 12-2013)

Part III	Information Regarding	Transfer of Property	(see instructions)
ı artılı	intormation riegarding	Transfer of Property	(acc illatituctiona)

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	9/26/14		150,726.00		
Stock and securities					
nstallment obligations, occount eceivables or imilar property					
Foreign currency or other property lenominated in oreign currency					
nventory					
Assets subject to depreciation ecapture (see emp. Regs. sec367(a)-4T(b))					
angible property sed in trade or usiness not listed nder another ategory					
ntangible roperty					
roperty to be leased as described in final and temp. Regs. sec367(a)-4(c))					
roperty to be old (as escribed in emp. Regs. sec. .367(a)-4T(d))					
ransfers of oil and as working interests is described in emp. Regs. sec. 367(a)-4T(e))					
ther property					

Supplemental Information Required To Be Reported (see instructions):						
N/A						
	······································					

Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)	
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:	
(8	a) Before188868_ % (b) After188868_ %	
10	Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351	
b	Indicate whether any transfer reported in Part III is subject to any of the following:  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Yes	X No X No X No No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	X No
b c d 14 15a	Indicate whether the transferor was required to recognize income under final and temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following:  Tainted property  Depreciation recapture  Branch loss recapture  Any other income recognition provision contained in the above-referenced regulations  Pid the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?  Yes  Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?  Yes  If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred   N/A	X No X No X No X No X No X No
16	Was cash the only property transferred? Yes	No
	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?  Yes  If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the	X No
<u>N/A</u>	transaction:	
	F 926 (Dav.)	10.0010)

(Rev. December 2013)

Department of the Treasury Internal Revenue Service

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

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

OMB No. 1545-0026

Attachment Sequence No. 128

Name of transferor	Identifying number (see instructions)
JOHN & MARY R. MARKLE FOUNDATION	13-1770307
<ul> <li>1 If the transferor was a corporation, complete questions 1a through</li> <li>a If the transfer was a section 361(a) or (b) transfer, was the transfer or fewer domestic corporations?</li> <li>b Did the transferor remain in existence after the transfer?</li> <li>If not, list the controlling shareholder(s) and their identifying number</li> </ul>	ror controlled (under section 368(c)) by 5  Yes No
Controlling shareholder	Identifying number
c If the transferor was a member of an affiliated group filing a consolic corporation? If not, list the name and employer identification number (EIN) of the	
Name of parent corporation	EIN of parent corporation
<ul> <li>d Have basis adjustments under section 367(a)(5) been made?</li> <li>2 If the transferor was a partner in a partnership that was the actu complete questions 2a through 2d.</li> <li>a List the name and EIN of the transferor's partnership:</li> </ul>	
Name of partnership	EIN of partnership
<ul> <li>b Did the partner pick up its pro rata share of gain on the transfer of partner disposing of its entire interest in the partnership?</li> <li>d Is the partner disposing of an interest in a limited partnership that is</li> </ul>	Yes X No regularly traded on an established
securities market?  Part II Transferee Foreign Corporation Information (see instru	ctions)
3 Name of transferee (foreign corporation) BVP-IV CAYMAN IX LIMITED	4a Identifying number, if any FOREIGN
5 Address (including country) PO BOX 309, UGLAND HOUSE, SOUTH CHURCH STREET	4b Reference ID number (see instructions)
GEORGE TOWN, GRAND CAYMAN KY1-1104  6 Country code of country of incorporation or organization (see instruc	BAUPOST4
7 Foreign law characterization (see instructions)	
CORPORATION	
8 Is the transferee foreign corporation a controlled foreign corporation	? X Yes No
or Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 12-201

Part III	Information Regarding	Transfer of Property	(see instructions)
ı arıı	into mation regarding	Transici of Froperty	(See insudellons)

Type of property	(a) Date of transfer	(b)  Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized or transfer
Cash	12/31/14		231,653.00		
Stock and securities					
nstallment obligations, account eceivables or similar property					
Foreign currency or other property denominated in oreign currency					
nventory					
Assets subject to depreciation ecapture (see emp. Regs. sec367(a)-4T(b))					
angible property sed in trade or usiness not listed nder another ategory					
atangible roperty					
roperty to be leased as described in final and temp. Regs. sec. 367(a)-4(c))					
roperty to be old (as escribed in emp. Regs. sec. 367(a)-4T(d))					
ransfers of oil and as working interests as described in emp. Regs. sec. 367(a)-4T(e))					
ther property					

 	·

Pa	rt IV Additional Information Regarding Transfer of Property (see instructions)
9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:
(8	a) Before0 % (b) After188868 %
10	Type of nonrecognition transaction (see instructions) ► IRC SECTION 351
b	Indicate whether any transfer reported in Part III is subject to any of the following:  Gain recognition under section 904(f)(3)  Gain recognition under section 904(f)(5)(F)  Recapture under section 1503(d)  Exchange gain under section 987  Yes X  No  Yes X  No  Yes X  No  No  No  No  No  No  No  No  No  N
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?
c d 14	Indicate whether the transferor was required to recognize income under final and temporary Regulations sections 1.367(a)-4 through 1.367(a)-6 for any of the following:  Tainted property  Depreciation recapture  Branch loss recapture  Any other income recognition provision contained in the above-referenced regulations  Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?  Yes X No  Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred ▶ \$N/A
16	Was cash the only property transferred? X Yes No
17a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?
b N/	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:  'A

(Rev. December 2013)

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

► Attach to your income tax return for the year of the transfer or distribution. OMB No. 1545-0026

Attachment Sequence No. 128

Name of transferor	Identifying number (see instructions)			
JOHN & MARY R. MARKLE FOUNDATION	13-1770307			
1 If the transferor was a corporation, complete questions 1a a If the transfer was a section 361(a) or (b) transfer, was th	e transferor controlled (under section 368(c)) by 5			
or fewer domestic corporations?	I Voc I No			
b Did the transferor remain in existence after the transfer?				
If not, list the controlling shareholder(s) and their identifying	ng number(s):			
Controlling shareholder	Identifying number			
<ul> <li>c If the transferor was a member of an affiliated group filing corporation?</li> <li>If not, list the name and employer identification number (Exercise)</li> </ul>	Yes No			
Name of parent corporation	EIN of parent corporation			
d Have basis adjustments under section 367(a)(5) been mad	e? Yes No			
<ul> <li>If the transferor was a partner in a partnership that was complete questions 2a through 2d.</li> <li>a List the name and EIN of the transferor's partnership:</li> </ul>	s the actual transferor (but is not treated as such under section 367)			
Name of partnership	EIN of partnership			
RIVERSTONE/CARLYLE TE PARNTERS IV, LP	26-148369			
b Did the partner pick up its pro rata share of gain on the tra	ansfer of partnership assets? Yes X No			
c Is the partner disposing of its entire interest in the partner	ship? Yes X No			
d Is the partner disposing of an interest in a limited partners	ship that is regularly traded on an established			
securities market?				
Part II Transferee Foreign Corporation Information (				
3 Name of transferee (foreign corporation)	4a Identifying number, if any			
R/C TE PARNTERS IV (CAYMAN), LP	98-0573369			
5 Address (including country)	4b Reference ID number (see instructions)			
P.O. BOX 908 GT, 87 MARY STREET, GEORGE TOWN, GRAND C.				
<ul> <li>Country code of country of incorporation or organization (</li> </ul>	see instructions)			
7 Foreign law characterization (see instructions)				
COROPORATION				
8 Is the transferee foreign corporation a controlled foreign of	corporation? Yes X No			
For Paperwork Reduction Act Notice, see separate instructions.	Form <b>926</b> (Rev. 12-201)			

### Part III Information Regarding Transfer of Property (see instructions)

Type of property	(a) Date of transfer	(b) Description of property	(c) Fair market value on date of transfer	(d) Cost or other basis	(e) Gain recognized or transfer
Cash	VARIOUS		108,005.00		
asii	VIIICIOOD				
	-				
tock and					
ecurities					
stallment oligations,					
count					
ceivables or					
milar property					
oreign currency					
other property					
enominated in					
reign currency					
	1		†		
ventory					
				AND THE ART	
ssets subject to					
epreciation					1. 1.481
ecapture (see					
emp. Regs. sec.					
.367(a)-4T(b))	//				
angible property					
sed in trade or					
usiness not listed nder another					
ategory					
atogory					
tangible					
roperty					
roperty to be leased as described in final					
nd temp. Regs. sec.					
367(a)-4(c))					
DESTRUCTION					
roperty to be					
old (as					
escribed in emp. Regs, sec.					
amp. Regs. sec. .367(a)-4T(d))					
ansfers of oil and					
s working interests s described in					
mp. Regs. sec.					
367(a)-4T(e))					
ther property		7			

/ 73			
/A			
<u> </u>	 	 	

9	Enter the transferor's interest in the foreign transferee corporation before and after the transfer:		
(a	) Before 2605 % <b>(b)</b> After 2605 %		
10	Type of nonrecognition transaction (see instructions) ▶ IRC SECTION 351		
11	Indicate whether any transfer reported in Part III is subject to any of the following:		
а	Gain recognition under section 904(f)(3)	Yes	X No
b	Gain recognition under section 904(f)(5)(F)	Yes	X
	Recapture under section 1503(d)	Yes	X No
	Exchange gain under section 987	Yes	X No
12	Did this transfer result from a change in the classification of the transferee to that of a foreign corporation?	Yes	X No
13	Indicate whether the transferor was required to recognize income under final and temporary Regulations		
	sections 1.367(a)-4 through 1.367(a)-6 for any of the following:		[v]
а	Tainted property	Yes	X No
b	Depreciation recapture	Yes	···
	Branch loss recapture	Yes	X No
d	Any other income recognition provision contained in the above-referenced regulations	Yes	X No
14	Did the transferor transfer assets which qualify for the trade or business exception under section 367(a)(3)?	Yes	X No
15 a	Did the transferor transfer foreign goodwill or going concern value as defined in Temporary Regulations section 1.367(a)-1T(d)(5)(iii)?	Yes	X No
b	If the answer to line 15a is "Yes," enter the amount of foreign goodwill or going concern value transferred $\blacktriangleright$ \$N/A		
16	Was cash the only property transferred?	X Yes	☐ No
17a	Was intangible property (within the meaning of section 936(h)(3)(B)) transferred as a result of the transaction?	Yes	X No
	If "Yes," describe the nature of the rights to the intangible property that was transferred as a result of the transaction:		
N/	A		