A Employer identification number

## THE PARKER FOUNDATION

Number and street (or P.O. box number if mail is not delivered to street address) 2604-B EL CAMINO REAL, SUITE 244
City or town, state or province, country, and ZIP or foreign postal code CARLSBAD, CA 92008


51-0141231
B Telephone number 760-720-0630

C If exemption application is pending, check here

D 1. Foreign organizations, check here
2. Foreign organizations meeting the $85 \%$ test, check here and attach computation
E If private foundation status was terminated under section $507(\mathrm{~b})(1)(\mathrm{A})$, check here
F If the foundation is in a 60 -month termination under section 507(b)(1)(B), check here

| (c) Adjusted net income | $\begin{aligned} & \text { (d) Disbursements } \\ & \text { for charitabele purposes } \\ & \text { (cash basis only) } \end{aligned}$ |
| :---: | :---: |
| N/A |  |
|  |  |
|  |  |
|  | STATEMENT 1 |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  |  |
|  | STATEMENT 2 |
|  |  |
|  | 123,721. |
|  |  |
|  |  |
|  |  |
|  | 43,461. |
|  | 7,128. |
|  | 0. |
|  | 200. |
|  |  |
|  |  |
|  | 5,952. |
|  |  |
|  | 17,740. |
|  | 198,202. |
|  | 1,670,050. |
|  | 1,868,252. |
|  |  |
|  |  |
| N/A |  |



## Part III Analysis of Changes in Net Assets or Fund Balances

```
1 Total net assets or fund balances at beginning of year - Part II, column (a), line 29
    (must agree with end-of-year figure reported on prior year's return)
2 Enter amount from Part I, line 27a
3 Other increases not included in line 2 (itemize)
4 Add lines 1, 2, and 3
5 Decreases not included in line 2 (itemize)
6 Total net assets or fund balances at end of year (line 4 minus line 5) - Part II, column (b), line 29
\begin{tabular}{|c|c|}
\hline 1 & 38,528,469. \\
\hline 2 & 1,399,011. \\
\hline 3 & 0. \\
\hline 4 & 39,927,480. \\
\hline 5 & 0. \\
\hline 6 & 39,927,480. \\
\hline \multicolumn{2}{|r|}{Form 990-PF (2021)} \\
\hline
\end{tabular}
```

SEE ATTACHED STATEMENTS

| (a) List and describe the kind(s) of property sold (for example, real estate, 2 -story brick warehouse; or common stock, 200 shs. MLC Co.) |  |  | $\begin{array}{r} \hline \text { (b) How } \\ \text { - Pu } \\ \text { D }-\mathrm{DO} \\ \hline \end{array}$ | (c) Date acquired (mo., day, yr.) | (d) Date sold (mo., day, yr.) |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1a |  |  |  |  |  |
| b |  |  |  |  |  |
| c |  |  |  |  |  |
| d |  |  |  |  |  |
| e |  |  |  |  |  |
| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost plus exp |  | (h) Gain or (loss) ((e) plus (f) minus |  |
| a |  |  |  |  |  |
| b |  |  |  |  |  |
| c |  |  |  |  |  |
| d |  |  |  |  |  |
| e 5,891,015. |  |  |  |  | ,720,347. |
| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69. |  |  |  |  |  |
| (i) FMV as of 12/31/69 | (j) Adjusted basis as of 12/31/69 | (k) Exce over co |  |  |  |
| a |  |  |  |  |  |
| b |  |  |  |  |  |
| c |  |  |  |  |  |
| d |  | 1 |  |  |  |
| e |  |  | 2,720,347. |  |  |
| $2 \text { Capital gain net income or (net capital loss) } \quad\left\{\begin{array}{l} \text { If gain, also enter in Part I, line } 7 \\ \text { If (loss), enter }-0-\text { in Part } 1, \text { line } 7 \end{array}\right\}$ |  |  |  | 2,720,347. |  |
| Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). See instructions. If (loss), enter -0- in Part I, line 8 |  |  |  | N/A |  |


\section*{| Part V | Excise Tax Based on Investment Income (Section 4940(a), 4940(b), or 4948- see instructions) |
| :--- | :--- |}



## Part VI-A

1a During the tax year, did the foundation attempt to influence any national, state, or local legislation or did it participate or intervene in any political campaign?
b Did it spend more than $\$ 100$ during the year (either directly or indirectly) for political purposes? See the instructions for the definition If the answer is "Yes" to $\mathbf{1 a}$ or $\mathbf{1 b}$, attach a detailed description of the activities and copies of any materials published or distributed by the foundation in connection with the activities.
c Did the foundation file Form 1120-POL for this year?
d Enter the amount (if any) of tax on political expenditures (section 4955) imposed during the year:
(1) On the foundation. \$ $\qquad$ 0 - (2) On foundation managers. \$ $\qquad$
e Enter the reimbursement (if any) paid by the foundation during the year for political expenditure tax imposed on foundation managers. \$ 0 .
2 Has the foundation engaged in any activities that have not previously been reported to the IRS? If "Yes," attach a detailed description of the activities.
3 Has the foundation made any changes, not previously reported to the IRS, in its governing instrument, articles of incorporation, or bylaws, or other similar instruments? If "Yes," attach a conformed copy of the changes
4a Did the foundation have unrelated business gross income of $\$ 1,000$ or more during the year? b If "Yes," has it filed a tax return on Form 990-T for this year?
5 Was there a liquidation, termination, dissolution, or substantial contraction during the year? If "Yes," attach the statement required by General Instruction $T$.
6 Are the requirements of section 508(e) (relating to sections 4941 through 4945) satisfied either:

- By language in the governing instrument, or
- By state legislation that effectively amends the governing instrument so that no mandatory directions that conflict with the state law remain in the governing instrument?
7 Did the foundation have at least \$5,000 in assets at any time during the year? If "Yes," complete Part II, col. (c), and Part XIV
8a Enter the states to which the foundation reports or with which it is registered. See instructions. CA
b If the answer is "Yes" to line 7, has the foundation furnished a copy of Form 990-PF to the Attorney General (or designate) of each state as required by General Instruction G? If "No," attach e
9 Is the foundation claiming status as a private operating foundation within the meaning of section $4942(\mathrm{j})(3)$ or $4942(\mathrm{j})(5)$ for calendar year 2021 or the tax year beginning in 2021? See the instructions for Part XIII. If "Yes," complete Part XIII
10 Did any persons become substantial contributors during the taxyear? If "Yes," atrach a schedule listing their names and addresses
11 At any time during the year, did the foundation, directly or indirectly, own a controlled entity within the meaning of section 512(b)(13)? If "Yes," attach schedule. See instructions
12 Did the foundation make a distribution to a donor advised fund over which the foundation or a disqualified person had advisory privileges? If "Yes," attach statement. See instructions
13 Did the foundation comply with the public inspection requirements for its annual returns and exemption application?

|  | Yes | No |
| :---: | :---: | :---: |
| 1a |  | X |
| 1b |  | X |
|  |  |  |
| 1 c |  | X |
|  |  |  |
| 2 |  | X |
|  |  |  |
| 3 |  | X |
| 4a |  | X |
| 4b |  |  |
| 5 |  | X |
|  |  |  |
| 6 | X |  |
| 7 | X |  |
|  |  |  |
| 8b | X |  |
|  |  |  |
| 9 |  | X |
| 10 |  | X |
| $11$ |  | $\mathrm{X}$ |
| 12 |  | X |
| 13 | X |  | Website address WWW.THEPARKERFOUNDATION.ORG

14 The books are in care of $\rightarrow$ LEXY HARSHMAN Telephone no. (760) 720-0630 Located at 2604-B EL CAMINO REAL, SUITE 244, CARLSBAD, CA ZIP+4 92008

16 At any time during calendar year 2021, did the foundation have an interest in or a signature or other authority over a bank, securities, or other financial account in a foreign country?
See the instructions for exceptions and filing requirements for FinCEN Form 114. If "Yes," enter the name of the foreign country

## Part VI-B $\quad$ Statements Regarding Activities for Which Form 4720 May Be Required

File Form 4720 if any item is checked in the "Yes" column, unless an exception applies.
1a During the year, did the foundation (either directly or indirectly):
(1) Engage in the sale or exchange, or leasing of property with a disqualified person?
(2) Borrow money from, lend money to, or otherwise extend credit to (or accept it from) a disqualified person?
(3) Furnish goods, services, or facilities to (or accept them from) a disqualified person?
(4) Pay compensation to, or pay or reimburse the expenses of, a disqualified person?
(5) Transfer any income or assets to a disqualified person (or make any of either available for the benefit or use of a disqualified person)?
(6) Agree to pay money or property to a government official? (Exception. Check "No" if the foundation agreed to make a grant to or to employ the official for a period after termination of government service, if terminating within 90 days.)
b If any answer is "Yes" to 1a(1)-(6), did any of the acts fail to qualify under the exceptions described in Regulations section 53.4941 (d)-3 or in a current notice regarding disaster assistance? See instructions
c Organizations relying on a current notice regarding disaster assistance, check here ..................................................
d Did the foundation engage in a prior year in any of the acts described in 1a, other than excepted acts, that were not corrected before the first day of the tax year beginning in 2021?
2 Taxes on failure to distribute income (section 4942) (does not apply for years the foundation was a private operating foundation defined in section 4942(j)(3) or 4942(j)(5)):
a At the end of tax year 2021, did the foundation have any undistributed income (Part XII, lines 6 d and 6 e ) for tax year(s) beginning before 2021? If "Yes," list the years $\qquad$
$\qquad$ , ,...........................
b Are there any years listed in 2a for which the foundation is not applying the provisions of section 4942(a)(2) (relating to incorrect valuation of assets) to the year's undistributed income? (If applying section 4942(a)(2) to all years listed, answer "No" and attach statement - see instructions.) $\qquad$
c If the provisions of section 4942(a)(2) are being applied to any of the years listed in $2 a$, list the years here.
$\qquad$ , $\qquad$ _ ,
3a Did the foundation hold more than a $2 \%$ direct or indirect interest in any business enterprise at any time during the year?
b If "Yes," did it have excess business holdings in 2021 as a result of (1) any purchase by the foundation or disqualified persons after May 26, 1969; (2) the lapse of the 5-year period (or longer period approved by the Commissioner under section 4943(c)(7)) to dispose of holdings acquired by gift or bequest; or (3) the lapse of the 10-, 15 -, or 20 -year first phase holding period? (Use Form 4720, Schedule C, to determine if the foundation had excess business holdings in 2021.) $N / A$
4a Did the foundation invest during the year any amount in a manner that would jeopardize its charitable purposes?
b Did the foundation make any investment in a prior year (but after December 31, 1969) that could jeopardize its charitable purpose that had not been removed from jeopardy before the first day of the tax year beginning in 2021?

\section*{| Part VI-B | Statements Regarding Activities for Which Form 4720 May Be Required (continued) |
| :--- | :--- | :--- |}

5a During the year, did the foundation pay or incur any amount to:
(1) Carry on propaganda, or otherwise attempt to influence legislation (section 4945(e))?
(2) Influence the outcome of any specific public election (see section 4955); or to carry on, directly or indirectly, any voter registration drive?
(3) Provide a grant to an individual for travel, study, or other similar purposes?
(4) Provide a grant to an organization other than a charitable, etc., organization described in section 4945(d)(4)(A)? See instructions
(5) Provide for any purpose other than religious, charitable, scientific, literary, or educational purposes, or for the prevention of cruelty to children or animals?
b If any answer is "Yes" to $5 \mathrm{a}(1)-(5)$, did any of the transactions fail to qualify under the exceptions described in Regulations section 53.4945 or in a current notice regarding disaster assistance? See instructions

N/A
c Organizations relying on a current notice regarding disaster assistance, check here

d If the answer is "Yes" to question 5a(4), does the foundation claim exemption from the tax because it maintained expenditure responsibility for the grant?
If "Yes," attach the statement required by Regulations section 53.4945-5(d).
6a Did the foundation, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?

|  |  | Yes | No |
| :---: | :---: | :---: | :---: |
|  | 5a(1) |  | X |
|  |  |  |  |
|  | 5a(2) |  | X |
|  | 5a(3) |  | X |
|  |  |  |  |
|  | 5a(4) |  | X |
|  |  |  |  |
|  | 5a(5) |  | X |
|  |  |  |  |
| N/A | 5 b |  |  |
| $\square \square$ |  |  |  |
| N/A. | 5d |  |  |
|  |  |  |  |
|  | 6a |  | X |
|  | 6 b |  | X |
|  |  |  |  |
|  | 7 a |  | X |
| N/A | 7 b |  |  |
|  |  |  |  |
|  | 8 |  | X |

b Did the foundation, during the year, pay premiums, directly or indirectly, on a personal benefit contract? If "Yes" to 6b, file Form 8870.
7a At any time during the tax year, was the foundation a party to a prohibited tax shelter transaction?
b If "Yes," did the foundation receive any proceeds or have any net income attributable to the transaction? $\qquad$
8 Is the foundation 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?
Part VII Information About Officers, Directors, Trustees, Foundation Managers, Highly Paid Employees, and Contractors


2 Compensation of five highest-paid employees (other than those included on line 1). If none, enter "NONE."

| (a) Name and address of each employee paid more than \$50,000 | (b) Title, and average hours per week devoted to position | (c) Compensation | (d) Contributions to employee benefit plans compensation | (e) Expense account, other allowances |
| :---: | :---: | :---: | :---: | :---: |
| NONE |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
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|  |  |  |  |  |



Part IX Minimum Investment Return (All domestic foundations must complete this part. Foreign foundations, see instructions.)


Part X Distributable Amount (see instructions) (Section 4942(j)(3) and (j)(5) private operating foundations and certain foreign organizations, check here $\square$ and do not complete this part.)

| 1 | Minimum investment return from Part IX, line 6 |  |  | 1 | 2,294,810. |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Tax on investment income for 2021 from Part V, line 5 | 2a | 51,080. |  |  |
| b | Income tax for 2021. (This does not include the tax from Part V.) | 2b |  |  |  |
| c | Add lines 2 a and 2 b |  |  | 2 c | 51,080. |
| 3 | Distributable amount before adjustments. Subtract line 2c from line 1 |  |  | 3 | 2,243,730. |
| 4 | Recoveries of amounts treated as qualifying distributions |  |  | 4 | 0 - |
| 5 | Add lines 3 and 4 |  |  | 5 | 2,243,730. |
|  | Deduction from distributable amount (see instructions) |  |  | 6 | 0 - |
|  | Distributable amount as adjusted. Subtract line 6 from line 5. Enter here and on Part XII, line 1 . |  |  | 7 | 2,243,730. |

Part XI Qualifying Distributions (see instructions)


## Part XII

## Undistributed Income (see instructions)

1 Distributable amount for 2021 from Part X, line 7
2 Undistributed income, if any, as of the end of 2021: a Enter amount for 2020 only b Total for prior years:
$\qquad$ , $\qquad$ , $\qquad$
3 Excess distributions carryover, if any, to 2021:
a From 2016
b From 2017
c From 2018
d From 2019
e From 2020
f Total of lines 3a through e
4 Qualifying distributions for 2021 from Part XI, line 4: \$ 1, 868, 252 . a Applied to 2020, but not more than line 2a b Applied to undistributed income of prior years (Election required - see instructions) c Treated as distributions out of corpus (Election required - see instructions) d Applied to 2021 distributable amount e Remaining amount distributed out of corpus
5 Excess distributions carryover applied to 2021 (If an amount appears in column (d), the same amount must be shown in column (a).)
6 Enter the net total of each column as indicated below:
a Corpus. Add lines $3 f, 4 c$, and $4 e$. Subtract line 5 b Prior years' undistributed income. Subtract line 4b from line 2b
c Enter the amount of prior years undistributed income for which a notice of deficiency has been issued, or on which the section 4942(a) tax has been previously assessed
d Subtract line 6c from line 6b. Taxable amount - see instructions
e Undistributed income for 2020. Subtract line 4a from line 2a. Taxable amount - see instr.
f Undistributed income for 2021. Subtract lines 4 d and 5 from line 1 . This amount must be distributed in 2022
7 Amounts treated as distributions out of corpus to satisfy requirements imposed by section 170(b)(1)(F) or 4942(g)(3) (Election may be required - see instructions)
8 Excess distributions carryover from 2016 not applied on line 5 or line 7
9 Excess distributions carryover to 2022. Subtract lines 7 and 8 from line 6a
10 Analysis of line 9: a Excess from 2017 b Excess from 2018 c Excess from 2019 d Excess from 2020 e Excess from 2021


1 a If the foundation has received a ruling or determination letter that it is a private operating foundation, and the ruling is effective for 2021, enter the date of the ruling

b Check box to indicate whether the for
2 a Enter the lesser of the adjusted net income from Part I or the minimum investment return from Part IX for each year listed
b $85 \%$ ( 0.85 ) of line $2 a$
c Qualifying distributions from Part XI, line 4, for each year listed
d Amounts included in line 2c not used directly for active conduct of exempt activities
e Qualifying distributions made directly for active conduct of exempt activities. Subtract line 2d from line 2c
3 Complete 3 a , b , or c for the alternative test relied upon:
a "Assets" alternative test - enter:
(1) Value of all assets
(2) Value of assets qualifying under section 4942(j)(3)(B)(i)
b "Endowment" alternative test - enter 2/3 of minimum investment return shown in Part IX, line 6, for each year listed
c "Support" alternative test - enter:
(1) Total support other than gross investment income (interest, dividends, rents, payments on securities loans (section 512(a)(5)), or royalties)
(2) Support from general public and 5 or more exempt organizations as provided in section 4942(j)(3)(B)(iii)
(3) Largest amount of support from an exempt organization
(4) Gross investment income
dation is a private operating foundation described in section
(e) Total

| Tax year | Prior 3 years |  |  | (d) Total |
| :---: | :---: | :---: | :---: | :---: |
|  | (a) 2021 | (b) 2020 | (c) 2019 |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

Part XIV Supplementary Information (Complete this part only if the foundation had \$5,000 or more in assets at any time during the year-see instructions.)

## 1 Information Regarding Foundation Managers:

a List any managers of the foundation who have contributed more than $2 \%$ of the total contributions received by the foundation before the close of any tax year (but only if they have contributed more than $\$ 5,000$ ). (See section 507(d)(2).)

## NONE

b List any managers of the foundation who own $10 \%$ or more of the stock of a corporation (or an equally large portion of the ownership of a partnership or other entity) of which the foundation has a $10 \%$ or greater interest.

## NONE

2 Information Regarding Contribution, Grant, Gift, Loan, Scholarship, etc., Programs:
Check here $\square$ if the foundation only makes contributions to preselected charitable organizations and does not accept unsolicited requests for funds. If the foundation makes gifts, grants, etc., to individuals or organizations under other conditions, complete items $2 \mathrm{a}, \mathrm{b}, \mathrm{c}$, and d .
a The name, address, and telephone number or email address of the person to whom applications should be addressed:

## SEE STATEMENT 10

b The form in which applications should be submitted and information and materials they should include:
c Any submission deadlines:
d Any restrictions or limitations on awards, such as by geographical areas, charitable fields, kinds of institutions, or other factors:

3 Grants and Contributions Paid During the Year or Approved for Future Payment

| Recipient | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
| :---: | :---: | :---: | :---: | :---: |
| Name and address (home or business) |  |  |  |  |
| a Paid during the year | N/A | PUBLIC CHARITY | GENERAL SUPPORT |  |
| A REASON TO SURVIVE 200 E. 12 TH ST <br> NATIONAL CITY, CA 91950 |  |  |  | 35,000. |
| ```A STEP BEYOND \\ 340 N ESCONDIDO BLVD \\ ESCONDIDO, CA 92025``` | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 10,000. |
| ALZHEIMER'S SAN DIEGO <br> 3635 RUFFIN ROAD SUITE 300 <br> SAN DIEGO, CA 92123 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 30,000. |
| ARMED SERVICES YMCA OF THE USA BOX 555028 <br> CAMP PENDLETON, CA 92055 | /A | UBLIC CHARITY | GENERAL SUPPORT | 18,500. |
| ASIAN CULTURE AND MEDIA ALLIANCE INC 3505 CAMINO DEL RIO SOUTH SUITE 305 SAN DIEGO, CA 92108 |  | PUBLIC Charity | GENERAL SUPPORT | 20,000. |
| Total .............................. SEE CONTINUATION SHEET(S) |  |  | ….......... ${ }^{\text {a }}$ | 1,670,050. |

b Approved for future payment

NONE

|  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| Total _...................................................................................................................... |  |  |  |  |  |

## Analysis of Income-Producing Activities

| Enter gross amounts unless otherwise indicated. | Unrelated business income |  | Excluded by section 512, 513, or 514 |  | (e) <br> Related or exempt function income |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | (a) <br> Business code | (b) <br> Amount | $\left(\begin{array}{c}\text { (c) } \\ \text { sclu- } \\ \text { sion } \\ \text { code }\end{array}\right.$ | (d) Amount |  |
| a |  |  |  |  |  |
| b |  |  |  |  |  |
| c |  |  |  |  |  |
| d |  |  |  |  |  |
| e |  |  |  |  |  |
| $f$ |  |  |  |  |  |
| g Fees and contracts from government agencies |  |  |  |  |  |
| 2 Membership dues and assessments |  |  |  |  |  |
| 3 Interest on savings and temporary cash investments |  |  |  |  |  |
| 4 Dividends and interest from securities |  |  | 14 | 1,163,121. |  |
| 5 Net rental income or (loss) from real estate: |  |  |  |  |  |
| a Debt-financed property |  |  |  |  |  |
| b Not debt-financed property |  |  |  |  |  |
| 6 Net rental income or (loss) from personal property |  |  |  |  |  |
| 7 Other investment income |  |  |  |  |  |
| 8 Gain or (loss) from sales of assets other than inventory. |  |  |  |  |  |
| 9 Net income or (loss) from special events |  |  |  |  |  |
| 10 Gross profit or (loss) from sales of inventory |  |  |  |  |  |
| 11 Other revenue: <br> a SEE STATEMENT 11 |  |  |  |  |  |
| b |  |  |  |  |  |
| c |  |  |  |  |  |
| d |  |  |  |  |  |
| e |  |  |  |  |  |
| 12 Subtotal. Add columns (b), (d), and (e) |  | 0 |  | 3,461,493. | 0. |
| 13 Total. Add line 12, columns (b), (d), and (e) (See worksheet in line 13 instructions to verify calcu |  |  |  | 13 | 3,461,493. |

## Part XV-B Relationship of Activities to the Accomplishment of Exempt Purposes

| Line No. <br> $\boldsymbol{\nabla}$ | Explain below how each activity for which income is reported in column (e) of Part XV-A contributed importantly to the accomplishment of <br> the foundation's exempt purposes (other than by providing funds for such purposes). |
| :--- | :--- |
|  | N/A |
|  |  |
|  |  |
|  |  |
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## Part XVI Information Regarding Transfers to and Transactions and Relationships With Noncharitable Exempt Organizations

1 Did the organization directly or indirectly engage in any of the following with any other organization described in section 501(c) (other than section 501(c)(3) organizations) or in section 527, relating to political organizations?
a Transfers from the reporting foundation to a noncharitable exempt organization of:
(1) Cash
(2) Other assets
b Other transactions:
(1) Sales of assets to a noncharitable exempt organization
(2) Purchases of assets from a noncharitable exempt organization
(3) Rental of facilities, equipment, or other assets
(4) Reimbursement arrangements
(5) Loans or loan guarantees
(6) Performance of services or membership or fundraising solicitations
c Sharing of facilities, equipment, mailing lists, other assets, or paid employees

|  | Yes | No |
| :---: | :---: | :---: |
|  |  |  |
| $1 a(1)$ |  | $X$ |
| $1 a(2)$ |  | $X$ |
|  |  |  |
| $1 b(1)$ |  | $X$ |
| $1 b(2)$ |  | $X$ |
| $1 b(3)$ |  | $X$ |
| $1 b(4)$ |  | $X$ |
| $1 b(5)$ |  | $X$ |
| $1 b(6)$ |  | $X$ |
| $1 c$ |  | $X$ |

d If the answer to any of the above is "Yes," complete the following schedule. Column (b) should always show the fair market value of the goods, other assets, or services given by the reporting foundation. If the foundation received less than fair market value in any transaction or sharing arrangement, show in column (d) the value of the goods, other assets, or services received.

| (a) Line no. | (b) Amount involved |  |
| :--- | :--- | :--- |
|  |  |  |
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|  |  |  |
|  |  |  |


|  | (c) Name of noncharitable exempt organization |  |
| :---: | :---: | :---: |
|  | N/A |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

(d) Description of transfers, transactions, and sharing arrangements
2a Is the foundation directly or indirectly affiliated with, or related to, one or more tax-exempt organizations described in section 501(c) (other than section 501(c)(3)) or in section 527 ?
b If "Yes," complete the following schedule.

(a) List and describe the kind(s) of property sold, e.g., real estate, 2 -story brick warehouse; or common stock, 200 shs. MLC Co.
1a PUBLICLY TRADED SECURITIES
b CCI CORE BOND FUND, L.P.
c AG REALTY FUND VIII LP - 1231 GAIN/LOSS
AG SF (L) L.P.
AG SF (L) L.P.
BROWN ADVISORY INVESTORS 2017 - SLP V (TE), LLLP
MONTAUK TRIGUARD FUND VI LP. - 1256 GAIN/LOSS
MONTAUK TRIGUARD FUND V LP
MONTAUK TRIGUARD FUND IV, LP - 1231 GAIN/LOSS
MONTAUK TRIGUARD FUND V LP - 1231 GAIN/LOSS
M MONTAUK TRIGUARD FUND IV, LP
MONTAUK TRIGUARD FUND V LP - 1256 GAIN/LOSS
MONTAUK TRIGUARD FUND VI LP.
MONTAUK TRIGUARD FUND VI LP. - 1231 GAIN/LOSS 0 NEW MOUNTAIN PARTNERS V (AIV-B2), L.P.


123591
$04-01-21$
(a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co.

1a MONTAUK TRIGUARD FUND IV, LP - 1256 GAIN/LOSS CPREF AIV III L.P.
CRESCENT CAPITAL HIGH INCOME FUND, L.P.
FRONTIER MID CAP GROWTH FUND LP CENTERBRIDGE PARTNERS REAL ESTATE FUND, L.P.
AG REALTY FUND VIII LP
NEW MOUNTAIN PARTNERS V, L.P.
CRESCENT CAPITAL HIGH INCOME FUND, L.P.
FRONTIER MID CAP GROWTH FUND LP
MONTAUK TRIGUARD FUND IV, LP
CPREF CAYMAN L.P.
AG REALTY FUND VIII LP
MONTAUK TRIGUARD FUND V LP
AG SF (L) L.P.
o MONTAUK TRIGUARD FUND VI LP.

| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale |  | (h) Gain or (loss) <br> (e) plus (f) minus (g) |
| :---: | :---: | :---: | :---: | :---: |
| a |  |  |  | -6. |
| b |  |  |  | 27,784. |
| c |  |  |  | 26,939. |
| d |  |  |  | 498,500. |
| e |  |  |  | 37. |
| f |  |  |  | -2,220. |
| g |  |  |  | 63,301. |
| h |  |  |  | 26,520. |
| i |  |  |  | 143,991. |
| j |  |  |  | -111. |
| k |  | $\checkmark$ |  | 389. |
| 1 |  |  |  | -420. |
| m |  |  |  | 126. |
| n |  |  |  | 223. |
| 0 |  |  |  | 102 . |
| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69 |  |  | (I) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than "-0-") |  |
| (i) F.M.V. as of $12 / 31 / 69$ | $\begin{aligned} & \text { (j) Adjusted basis } \\ & \text { as of } 12 / 31 / 69 \\ & \hline \end{aligned}$ | (k) Excess of col. (i) over col. (j), if any |  |  |
| a |  |  |  | -6. |
| b |  |  |  | 27,784. |
| c |  |  |  | 26,939. |
| d |  |  |  | 498,500. |
| e |  |  |  | 37. |
| f |  |  |  | -2,220. |
| g |  |  |  | 63,301. |
| h |  |  |  | 26,520. |
| i |  |  |  | 143,991. |
| j |  |  |  | -111. |
| k |  |  |  | 389. |
| 1 |  |  |  | -420. |
| m |  |  |  | 126. |
| n |  |  |  | 223. |
| 0 |  |  |  | 102. |
|  |  |  | 2 |  |
| Net short-term capital gain or (loss) as defined in sections 1222(5) and (6): If gain, also enter in Part I, line 8, column (c). <br> If (loss), enter "-0-" in Part I, line 8 |  |  | 3 |  |

${ }_{04-01-21}^{123591}$
(a) List and describe the kind(s) of property sold, e.g., real estate, 2-story brick warehouse; or common stock, 200 shs. MLC Co.
1a NEW MOUNTAIN PARTNERS VI, L.P.
b CENTERBRIDGE PARTNERS REAL ESTATE FUND, L.P.
c BROWN ADVISORY INVESTORS 2017 - SLP V (TE), LLLP d CCI CORE BOND FUND, L.P. e CAPITAL GAINS DIVIDENDS

| $f$ |
| :--- |
| f |
| g |
| i |
| j |
| $k$ |
| l |
| $m$ |
| $n$ |
| 0 |


| (e) Gross sales price | (f) Depreciation allowed (or allowable) | (g) Cost or other basis plus expense of sale |  | (h) Gain or (loss) <br> (e) plus (f) minus (g) |
| :---: | :---: | :---: | :---: | :---: |
| a |  |  |  | 116. |
| b |  |  |  | 2,291. |
| c |  |  |  | 1,512. |
| d |  |  |  | -34,451. |
| 1,609,584. |  |  |  | 1,609,584. |
| f |  |  |  |  |
| g |  |  |  |  |
| h |  |  |  |  |
| i |  |  |  |  |
| j |  |  |  |  |
| k |  | 1 |  |  |
| 1 |  |  |  |  |
| m |  |  |  |  |
| n |  |  |  |  |
| 0 |  |  |  |  |
| Complete only for assets showing gain in column (h) and owned by the foundation on 12/31/69 |  |  | (I) Losses (from col. (h)) Gains (excess of col. (h) gain over col. (k), but not less than " $-0-$ ") |  |
| (i) F.M.V. as of 12/31/69 | $\begin{aligned} & \hline \text { (j) Adjusted basis } \\ & \text { as of } 12 / 31 / 69 \end{aligned}$ | (k) Excess of col. (i) over col. (j), if any |  |  |
| a |  |  | 116. |  |
| b |  |  | 2,291. |  |
| c |  |  | 1,512. |  |
| d |  |  | -34,451. |  |
| e |  |  | 1,609,584. |  |
| f |  |  |  |  |
| g |  |  |  |  |
| h |  |  |  |  |
| i |  |  |  |  |
| j |  |  |  |  |
| k |  |  |  |  |
| 1 |  |  |  |  |
| m |  |  |  |  |
| n |  |  |  |  |
|  |  |  |  |  |
|  |  |  | 2 | 2,720,347. |
|  |  |  | 3 | N/A |

${ }_{04-0}^{12391-21}$

| Part XIV | Supplementary Information |
| :--- | :--- |



| Part XIV | Supplementary Information |
| :--- | :--- |



| Part XIV | Supplementary Information |
| :--- | :--- |



| Part XIV | Supplementary Information |
| :--- | :--- |


| 3 Grants and Contributions Paid During th | (Continuation) |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Recipient | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
| Name and address (home or business) |  |  |  |  |
| SAN DIEGO AFRICAN AMERICAN MUSEUM OF FINE ART INC. <br> 555 SATURN BLVD <br> SAN DIEGO, CA 92154 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 15,000. |
| SAN DIEGO ART INSTITUTE 1439 EL PRADO <br> SAN DIEGO, CA 92101 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 20,000. |
| SAN DIEGO CHILDREN'S DISCOVERY MUSEUM <br> 320 N BROADWAY <br> ESCONDIDO, CA 92025 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 10,000. |
| SAN DIEGO COUNCIL ON LITERACY <br> 3245 UNIVERSITY AVE 301 ROOM 301 <br> SAN DIEGO, CA 92104 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 10,000. |
| SAN DIEGO FOOD SYSTEM ALLIANCE <br> 2159 INDIA STREET <br> SAN DIEGO, CA 92101 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 50,000. |
| ```SAN DIEGO MANA 404 EUCLID AVE SUITE 308 SAN DIEGO, CA 92114``` | $\mathrm{N} / \mathrm{A}$ | PUBLIC CHARITY | GENERAL SUPPORT | 20,000. |
| SAN DIEGO OPERA ASSOCIATION <br> 233 A STREET SUITE 500 <br> SAN DIEGO, CA 92101 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 40,000. |
| SAN DIEGO PARKS FOUNDATION <br> PO BOX 1576 <br> LA JOLLA, CA 92038 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 35,000. |
| SAN DIEGO SOCIETY OF NATURAL HISTORY PO BOX 121390 <br> SAN DIEGO, CA 92112 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 25,000. |
| SAN DIEGO WORKFORCE PARTNERSHIP INC <br> 9246 LIGHTWAVE AVE NO 210 <br> SAN DIEGO, CA 92123 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 30,000. |
| Total from continuation sheets ............. |  |  |  |  |


| Part XIV | Supplementary Information |
| :--- | :--- |


| 3 Grants and Contributions Paid During | (Continuation) |  |  |  |
| :---: | :---: | :---: | :---: | :---: |
| Recipient | If recipient is an individual, show any relationship to any foundation manager or substantial contributor | Foundation status of recipient | Purpose of grant or contribution | Amount |
| Name and address (home or business) |  |  |  |  |
| SHARIA'S CLOSET <br> 6244 EL CAJON BLVD <br> SAN DIEGO, CA 92115 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 20,000. |
| SOCIAL GOOD FUND INC 12651 SAN PABLO AVE RICHMOND, CA 94805 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 15,000. |
| ```SOMALI FAMILY SERVICE OF SAN DIEGO PO BOX 15833 SAN DIEGO, CA 92175``` | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 18,000. |
| STAR PAL <br> 4110 54TH STREET <br> SAN DIEGO, CA 92105 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 50,000. |
| TEACH FOR AMERICA INC <br> 25 BROADWAY 12TH FLOOR <br> NEW YORK, NY 10004 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 20,000. |
| THE CHICANO FEDERATION OF SAN DIEGO 3180 UNIVERSITY AVENUE <br> SAN DIEGO, CA 92104 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 40,000. |
| ```THE OLD GLOBE THEATRE P.O. BOX 122171 SAN DIEGO, CA 92112``` | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 10,000. |
| THE PUTNAM FOUNDATION <br> 2550 5TH AVENUE <br> SAN DIEGO, CA 92103 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 60,000. |
| UC SAN DIEGO FOUNDATION 9500 GILMAN DRIVE <br> SAN DIEGO, CA 92093 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 20,000. |
| UNITED THROUGH READING <br> 1455 FRAZEE ROAD <br> SAN DIEGO, CA 92108 | N/A | PUBLIC CHARITY | GENERAL SUPPORT | 25,000. |
| Total from continuation sheets |  |  |  |  |

Part XIV


Department of the Treasury
Internal Revenue Service

## THE PARKER FOUNDATION

Employer identification number
51-0141231

Note: Generally, the corporation is not required to file Form 2220 (see Part II below for exceptions) because the IRS will figure any penalty owed and bill the corporation. However, the corporation may still use Form 2220 to figure the penalty. If so, enter the amount from page 2 , line 38 , on the estimated tax penalty line of the corporation's income tax return, but do not attach Form 2220.

\section*{| Part I | Required Annual Payment |
| :--- | :--- |}

1 Total tax (see instructions)
2 a Personal holding company tax (Schedule PH (Form 1120), line 26) included on line 1
b Look-back interest included on line 1 under section 460(b)(2) for completed long-term contracts or section $167(\mathrm{~g})$ for depreciation under the income forecast method
c Credit for federal tax paid on fuels (see instructions)
d Total. Add lines 2a through 2c
3 Subtract line 2d from line 1. If the result is less than $\$ 500$, do not complete or file this form. The corporation does not owe the penalty
4 Enter the tax shown on the corporation's 2020 income tax return. See instructions. Caution: If the tax is zero or the tax year was for less than 12 months, skip this line and enter the amount from line 3 on line 5

5 Required annual payment. Enter the smaller of line 3 or line 4 . If the corporation is required to skip line 4 , enter the amount from line 3

|  |  |  |
| :--- | :--- | :--- |
|  |  |  |

Part II Reasons for Filing - Check the boxes below that apply. If any boxes are checked, the corporation must file Form 2220 even if it does not owe a penalty. See instructions.
$6 \quad \square$ The corporation is using the adjusted seasonal installment method.
7 X The corporation is using the annualized income installment method.
8 X The corporation is a "large corporation" figuring its first required installment based on the prior year's tax.

## Part III Figuring the Underpayment

9 Installment due dates. Enter in columns (a) through (d) 15th day of the 4th (Form 990-PF filers: Use 5th month), 6th, 9th, and 12th months of the corporation's tax year
10 Required installments. If the box on line 6 and/or line 7 above is checked, enter the amounts from Sch $A$, line 38. If the box on line 8 (but not 6 or 7 ) is checked, see instructions for the amounts to enter. If none of these boxes are checked, enter $25 \%(0.25)$ of line 5 above in each column
11 Estimated tax paid or credited for each period. For column (a) only, enter the amount from line 11 on line 15. See instructions
Complete lines 12 through 18 of one column before going to the next column.
12 Enter amount, if any, from line 18 of the preceding column
13 Add lines 11 and 12
14 Add amounts on lines 16 and 17 of the preceding column
15 Subtract line 14 from line 13 . If zero or less, enter -0 -
16 If the amount on line 15 is zero, subtract line 13 from line 14. Otherwise, enter -0-

17 Underpayment. If line 15 is less than or equal to line 10 , subtract line 15 from line 10 . Then go to line 12 of the next column. Otherwise, go to line 18
18 Overpayment. If line 10 is less than line 15 , subtract line 10 If
the
ions
.....
5.

from line 15. Then go to line 12 of the next column

27,624.
42,624.
Go to Part IV on page 2 to figure the penalty. Do not go to Part IV if there are no entries on line 17 - no penalty is owed.
LHA For Paperwork Reduction Act Notice, see separate instructions.
Form 2220 (2021)

## Part IV Figuring the Penalty



* Use the penalty interest rate for each calendar quarter, which the IRS will determine during the first month in the preceding quarter.

These rates are published quarterly in an IRS News Release and in a revenue ruling in the Internal Revenue Bulletin. To obtain this information on the Internet, access the IRS website at www.irs.gov. You can also call 1-800-829-4933 to get interest rate information.

Form 2220 (2021)

## Schedule A Adjusted Seasonal Installment Method and Annualized Income Installment Method <br> See instructions.

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

## Part I Adjusted Seasonal Installment Method

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

| 1 Enter taxable income for the following periods. <br> a Tax year beginning in 2018 <br> b Tax year beginning in 2019 | 1 a | (a) | (b) | (c) | (d) |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | First 3 months | First 5 months | First 8 months | First 11 months |
|  |  |  |  |  |  |
|  | 1b |  |  |  |  |
| c Tax year beginning in 2020 <br> 2 Enter taxable income for each period for the tax year beginning in 2021. See the instructions for the treatment of extraordinary items | 1 c |  |  |  |  |
|  | 2 |  |  |  |  |
| 3 Enter taxable income for the following periods. | 3a | First 4 months | First 6 months | First 9 months | Entire year |
| a Tax year beginning in 2018 |  |  |  |  |  |
| b Tax year beginning in 2019 | 3b |  |  |  |  |
| c Tax year beginning in 2020 | 3c |  |  |  |  |
| 4 Divide the amount in each column on line 1a by the amount in column (d) on line 3a | 4 |  |  |  |  |
| 5 Divide the amount in each column on line 1 b by the amount in column (d) on line 3b | 5 |  |  |  |  |
| 6 Divide the amount in each column on line 1c by the amount in column (d) on line 3c | 6 |  |  |  |  |
| 7 Add lines 4 through 6 | 7 |  |  |  |  |
|  | $8$ |  |  |  |  |
| 9a Divide line 2 by line 8b Extraordinary items (see instructio.... | 9a |  |  |  |  |
|  | 9b |  |  |  |  |
| c Add lines 9a and 9b | 9 C |  |  |  |  |
| 10 Figure the tax on the amt on In 9c using the instr for Form 1120, Sch J, line 2, or comparable line of corp's return | 10 |  |  |  |  |
| 11a Divide the amount in columns (a) through (c) on line 3a by the amount in column (d) on line 3a | 11a |  |  |  |  |
| b Divide the amount in columns (a) through (c) on line 3b by the amount in column (d) on line 3b | 11b |  |  |  |  |
| c Divide the amount in columns (a) through (c) on line 3c by the amount in column (d) on line 3c | 110 |  |  |  |  |
| 12 Add lines 11a through 11c | 12 |  |  |  |  |
| 13 Divide line 12 by 3.0 | 13 |  |  |  |  |
| 14 Multiply the amount in columns (a) through (c) of line 10 by columns (a) through (c) of line 13 . In column (d), enter the amount from line 10, column (d) | 14 |  |  |  |  |
| 15 Enter any alternative minimum tax (trusts only) for each payment period. See instructions | 15 |  |  |  |  |
| 16 Enter any other taxes for each payment period. See instr. | 16 |  |  |  |  |
| 17 Add lines 14 through 16 | 17 |  |  |  |  |
| 18 For each period, enter the same type of credits as allowed on Form 2220, lines 1 and 2 c. See instructions | 18 |  |  |  |  |
| 19 Total tax after credits. Subtract line 18 from line 17. If zero or less, enter -0- | 19 |  |  |  |  |

## Part II Annualized Income Installment Method



| FORM 990-PF | DIVIDENDS | AND |
| :--- | :---: | :---: | :---: | :---: | :---: |

FRONTIER MID CAP GROWTH FUND LP INTEREST KITCHENS FOR GOOD
MDF FUND I, LP INTEREST
MONTAUK TRIGUARD FUND IV, LP -
DIVIDENDS
MONTAUK TRIGUARD
FUND IV, LP -
INTEREST
MONTAUK TRIGUARD FUND V LP -
DIVIDENDS
1,397.
0 。
1, 397 。
1,397.
MONTAUK TRIGUARD FUND V LP -
INTEREST
MONTAUK TRIGUARD
FUND VI LP. -
DIVIDENDS
MONTAUK TRIGUARD
FUND VI LP. -
INTEREST
RREF III DEBT
DOMESTIC
INVESTORS, LP -
DIVIDENDS
RREF III DEBT
DOMESTIC
INVESTORS, LP -
INTEREST
RREF III PROPERTY DOMESTIC
INVESTORS, LP -
DIVIDENDS
RREF III PROPERTY
DOMESTIC
INVESTORS, LP -
INTEREST
SILVER LAKE
PARTNERS VI L.P. -
INTEREST
SILVER LAKE
PARTNERS VI REGAL
FEEDER I, L.P. -
INTEREST
US BANK - CAPITAL
GAIN DIVIDENDS
US BANK -
DIVIDENDS
US BANK - INTEREST
US BANK - MUTUAL
FUND DIVIDENDS
TO PART I, LINE 4

| FORM 990-PF OTHER | INCOME |  | STATEMENT 2 |
| :---: | :---: | :---: | :---: |
| DESCRIPTION | (A) <br> REVENUE <br> PER BOOKS | (B) NET INVESTMENT INCOME | (C) <br> ADJUSTED NET INCOME |
| AG REALTY FUND VIII LP - OTHER |  |  |  |
| INCOME | -8,145. | -8,145. |  |
| AG SF (L) L.P. - OTHER INCOME | -3,210. | -3,210. |  |
| BROWN ADVISORY INVESTORS 2017 - SLP |  |  |  |
| V (TE), LLLP - OTHER INCOME | -33. | -33. |  |
| CENTERBRIDGE PARTNERS REAL ESTATE |  |  |  |
| FUND, L.P. - OTHER INCOME | -30. | -30. |  |
| CPREF CAYMAN, L.P. - OTHER INCOME | 3,578. | 3,578. |  |
| LITIGATION SETTLEMENT | 990. | 990. |  |
| MONTAUK TRIGUARD FUND IV, LP - |  |  |  |
| OTHER INCOME | -24. | -24. |  |
| MONTAUK TRIGUARD FUND IV, LP - |  |  |  |
|  |  |  |  |
| MONTAUK TRIGUARD FUND V LP - OTHER |  |  |  |
| INCOME | 3,537. | 3,537. |  |
| MONTAUK TRIGUARD FUND V LP - |  |  |  |
| MONTAUK TRIGUARD FUND VI LP - OTHER -3,635.INCOME |  |  |  |
| MONTAUK TRIGUARD FUND VI LP - |  |  |  |
| PARTNERSHIP BOOK INCOME ADJ - NOT |  |  |  |
| TAXABLE - -437,887. 0 |  |  |  |
| REFUND OF GRANT PAID 30.0 |  |  |  |
| VANCE STREET CAPTAL III, LP | -6,229. | -6,229. |  |
| WHITE OAK RESOURCES - ROYALTIES 236. 236. |  |  |  |
| CPREF AIV I HOLDINGS - A, L.P. - |  |  |  |
| OTHER INCOME 27. 27. |  |  |  |
| FRONTIER MID CAP GROWTH FUND LP - |  |  |  |
| OTHER INCOME | 207. | 207. |  |
| RREF III PROPERTY DOMESTIC |  |  |  |
| INVESTORS, LP - OTHER INCOME | 28,362. | 28,362. |  |
| TOTAL TO FORM 990-PF, PART I, LINE 11 | -421,975. | 15,882. |  |


| DESCRIPTION | (A) <br> EXPENSES <br> PER BOOKS | (B) <br> NET INVESTMENT INCOME | (C) <br> ADJUSTED <br> NET INCOME | (D) <br> CHARITABLE PURPOSES |
| :---: | :---: | :---: | :---: | :---: |
| ACCOUNTING AND AUDIT | 48,290. | 4,829. |  | 43,461. |
| TO FORM 990-PF, PG 1, LN 16B | 48,290. | 4,829. |  | 43,461. |


| FORM 990-PF OTHER PROFESSIONAL FEES | STATEMENT 4 |
| :--- | :--- |

## DESCRIPTION

ADVISORY AND INVESTMENT CUSTODIAN FEES
TECHNOLOGY SERVICES
FROM K-1: AG REALTY FUND
VIII LP
FROM K-1: AG SF (L), L.P.
FROM K-1: BROWN ADVISORY INVESTORS 2017 - SLP V (TE), LLLP
FROM K-1: CCI CORE BOND FUND L.P.
FROM K-1: CANTERBURY CONSULTING SPFS FUND VIII, LP
FROM K-1: CENTERBRIDGE PARTNERS REAL ESTATE FUND,
L. P.

FROM K-1: CPREF AIV I
HOLDINGS - RC, L.P.
FROM K-1: CPREF AIV I
HOLDINGS, L.P.
FROM K-1: CPREF AIV II, L. P.

FROM K-1: CPREF AIV III, L. P.

FROM K-1: CPREF AIV IV
HOLDINGS, L.P.
FROM K-1: CPREF CAYMAN, L. P.

FROM K-1: CRESCENT HIGH
INCOME FUND, L.P.
FROM K-1: FRONTIER MID CAP GROWTH FUND LP
FROM K-1: MONTAUK TRIGUARD
FUND IV, LP
FROM K-1: MONTAUK TRIGUARD
FUND V LP
FROM K-1: MONTAUK TRIGUARD FUND VI, LP.
FROM K-1: NEW MOUNTAIN
PARTNERS V, L.P.
FROM K-1: NEW MOUNTAIN
PARTNERS V (AIV-A2)
FROM K-1: NEW MOUNTAIN
PARTNERS VI, L.P.
FROM K-1: NEW MOUNTAIN PARTNERS VI AGRREGATOR, L. P.

FROM K-1: RREF III DEBT DOMESTIC INVESTORS, LP

| (A) <br> EXPENSES | (B) <br> NET INVEST- | (C) <br> ADJUSTED | (D) <br> CHARITABLE |
| :---: | :---: | :---: | :---: |
| PER BOOKS | MENT INCOME | NET INCOME | PURPOSES |
| 103,433 | 103,433. |  | 0. |
| 15,052 | 15,052. |  | 0. |
| 7,128 | 0 . |  | 7,128. |
| 0 | 953. |  | 0. |
| 0 | 283. |  | 0. |
| 0 | 6,600. |  | 0. |
| 0 | 6,766. |  | 0. |
| 0 | 2,712. |  | 0. |
| 0 | 1,627. |  | 0. |
|  | 49. |  | 0 . |
|  | 21. |  | 0. |
|  | 1,418. |  | 0. |
|  | 498. |  | 0. |
| 0 | 42. |  | 0. |
| 0 | 147. |  | 0. |
| 0 | 1,839. |  | 0 . |
| 0 | 15,679. |  | 0 . |
| 0 | 1,799. |  | 0. |
| 0 | 1,957. |  | 0. |
| 0 | 5,424. |  | 0 . |
| 0 | 1,613. |  | 0. |
| 0 | 9. |  | 0. |
| 0 | 10,044. |  | 0. |
| 0 | 4. |  | 0. |
| 0 | 42. |  | 0. |

FROM K-1: RREF III
PROPERTY DOMESTIC

INVESTORS, LP 0. 429 .
0 .
FROM K-1: SILVER LAKE
PARTNERS VI, L.P.
FROM K-1: CPREF AIV I
FROM K-1: CPREF AIV I
HOLDINGS - DOCK HV, L.P.
FROM K-1: CPREF AIV I
HOLDINGS - HOTEL, L.P.
FROM K-1: CPREF AIV V,
L. P.

FROM K-1: VANCE STREET
CAPITAL III, L.P.
TO FORM 990-PF, PG 1, LN 16C 125,613. 194,841. 7,128.




| FORM 990-PF | OTHER ASSETS |  | STATEMENT |
| :---: | :---: | :---: | :---: |
|  | BEGINNING OF | END OF YEAR | FAIR MARKET |
| DESCRIPTION | YR BOOK VALUE | BOOK VALUE | VALUE |
| ACCRUED INTEREST AND DIVIDENDS | 7,296. | 17,959. | 17,959. |
| PREPAID INSURANCE | 1,851. | 3,063. | 3,063. |
| OTHER PREPAID EXPENSES | 21,571. | 14,597. | 14,597. |
| RECEIVABLE FROM KITCHENS FOR GOOD | 6,372. | 0. | 0. |
| TO FORM 990-PF, PART II, LINE 15 | 37,090. | 35,619. | 35,619. |


| FORM 990-PF | PART VII - LIST OF OFFICERS, DIRECTORS <br> TRUSTEES AND FOUNDATION MANAGERS | STATEMENT 9 |
| :--- | :---: | :---: |
|  |  |  |


| NAME AND ADDRESS |
| :--- |
| JUDY MCDONALD <br> 2604-B EL CAMINO REAL, SUITE 244 <br> CARLSBAD, CA 92008 |

WILLIAM G. BEAMER
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

```
ANN DAVIES
2604-B EL CAMINO REAL, SUITE 244
``` CARLSBAD, CA 92008

DORI KAUFMAN
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

ROBBIN C. POWELL
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

GORDON SWANSON
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

PAUL MOSHER
2604-B EL CAMINO REAL, SUITE 244
CARLSBAD, CA 92008

RAYMOND ELLIS
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

ERNEST BORUNDA
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

VICKI REED
2604-B EL CAMINO REAL, SUITE 244 CARLSBAD, CA 92008

\begin{tabular}{l} 
137,468. \\
\hline
\end{tabular}
\begin{tabular}{lll}
\hline \hline FORM \(990-\mathrm{PF}\) & GRANT & \begin{tabular}{l} 
APPLICATION SUBMISSION INFORMATION \\
\\
\\
\end{tabular}\(\quad\) PART XIV, LINES 2A THROUGH 2D
\end{tabular}

NAME AND ADDRESS OF PERSON TO WHOM APPLICATIONS SHOULD BE SUBMITTED
LEXY HARSHMAN, CHIEF ADMINISTRATIVE OFFICER, PARKER FOUNDATION 2604-B EL CAMINO REAL, SUITE 244
CARLSBAD, CA 92008
TELEPHONE NUMBER
(760)720-0630

FORM AND CONTENT OF APPLICATIONS
VERIFICATION OF EXEMPT STATUS; SPECIFIC PURPOSE AND RELEVANT PROJECT
DETAIL; BUDGET OF ORGANIZATION AND PROJECT; METHOD OF MEASURING RESULTS OF
PROJECT; REPORTS ON OUTCOMES AND RESULTS WILL BE REQUIRED SIX MONTHS AFTER
GRANT RECEIPT. SEE WWW.THEPARKERFOUNDATION.ORG FOR MORE DETAILS.

ANY SUBMISSION DEADLINES
NONE

RESTRICTIONS AND LIMITATIONS ON AWARDS
FUNDS ARE LIMITED TO PROJECTS BENEFITTING SAN DIEGO COUNTY.


Name and title of officer or person subject to tax RAYMOND ELLIS

\section*{\begin{tabular}{|l|l}
\hline Part I & Type of Return and Return Information \\
\hline
\end{tabular}}

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 \(\mathbf{1 a , 2 a , 3 a , 4 a , 5 a , 6 a , 7 a , 8 a , 9 a , ~}\) or \(\mathbf{1 0 a}\) below, and the amount on that line for the return being filed with this form was blank, then leave line \(\mathbf{1 b}, \mathbf{2 b}, \mathbf{3 b}, \mathbf{4 b}, \mathbf{5 b}, \mathbf{6 b} \mathbf{7 b} \mathbf{8 b} \mathbf{9 b} \mathbf{9 b} \mathbf{1 0 b}\), 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 \(I\).


2021 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. / 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
X Iauthorize EISNER ADVISORY GROUP LLC
ERO firm name
to enter my PIN
\begin{tabular}{c}
\hline 92037 \\
\(\begin{array}{c}\text { Enter five numbers, but } \\
\text { do not enter all zeros }\end{array}\)
\end{tabular}
as my signature on the tax year 2021 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 2021 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.

\begin{tabular}{|l|l}
\hline Part III & Certification and Authentication \\
\hline
\end{tabular}
ERO's EFIN/PIN. Enter your six-digit electronic filing identification
number (EFIN) followed by your five-digit self-selected PIN.

\section*{33644392037 \\ Do not enter all zeros}

I certify that the above numeric entry is my PIN, which is my signature on the 2021 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.


\section*{ERO Must Retain This Form - See Instructions}

Do Not Submit This Form to the IRS Unless Requested To Do So
LHA For Privacy act and Paperwork Reduction Act Notice, see instructions.
Form 8879-TE (2021)

102521 01-11-22

Form 8868
(Rev. January 2022)

Department of the Treasury Internal Revenue Service

\section*{Application for Automatic Extension of Time To File an Exempt Organization Return}
- File a separate application for each return. \(>\) Go to www.irs.gov/Form8868 for the latest information.

Electronic filing (e-file). You can electronically file Form 8868 to request a 6 -month automatic extension of time to file any of the forms listed below with the exception of Form 8870, Information Return for Transfers Associated With Certain Personal Benefit Contracts, for which an extension request must be sent to the IRS in paper format (see instructions). For more details on the electronic filing of this form, visit www.irs.gov/e-file-providers/e-file-for-charities-and-non-profits.
Automatic 6-Month Extension of Time. Only submit original (no copies needed).
All corporations required to file an income tax return other than Form 990-T (including 1120-C filers), partnerships, REMICs, and trusts must use Form 7004 to request an extension of time to file income tax returns.


Caution: If you are going to make an electronic funds withdrawal (direct debit) with this Form 8868, see Form 8453-TE and Form 8879-TE for payment instructions.
LHA For Privacy Act and Paperwork Reduction Act Notice, see instructions.
Form 8868 (Rev. 1-2022)

EXTENDED TO AUGUST 15, 2023


\section*{LHA For Paperwork Reduction Act Notice, see instructions.}

Form 990-T (2021)

\section*{\begin{tabular}{|l|l|}
\hline Part III & Tax and Payments \\
\hline
\end{tabular}}

1a Foreign tax credit (corporations attach Form 1118; trusts attach Form 1116)
b Other credits (see instructions)
c General business credit. Attach Form 3800 (see instructions)
d Credit for prior year minimum tax (attach Form 8801 or 8827)
e Total credits. Add lines 1a through 1d
2 Subtract line 1e from Part II, line 7
3 Other amounts due. Check if from: \(\qquad\) Form 4255 Other (attach statement)


4 Total tax. Add lines 2 and 3 (see instructions).
\(\square\) Check if includes tax previously deferred under section 1294. Enter tax amount here
5 Current net 965 tax liability paid from Form 965-A or Form 965-B, Part II, column (k), line 4
6a Payments: A 2020 overpayment credited to 2021
b 2021 estimated tax payments. Check if section 643(g) election applies
c Tax deposited with Form 8868
d Foreign organizations: Tax paid or withheld at source (see instructions)
e Backup withholding (see instructions)
f Credit for small employer health insurance premiums (attach Form 8941)
g Other credits, adjustments, and payments: \(\square\) Form 2439 \(\square\) Form \(4136 \quad \square\) Other \(\quad\) Total
7 Total payments. Add lines 6 a through 6 g
8 Estimated tax penalty (see instructions). Check if Form 2220 is attached
9 Tax due. If line 7 is smaller than the total of lines 4,5 , and 8 , enter amount owed
10 Overpayment. If line 7 is larger than the total of lines 4,5 , and 8 , enter amount overpaid
11 Enter the amount of line 10 you want: Credited to 2022 estimated tax 10,000 . Refunded
Part IV
1 At any time during the 2021 calendar year, did the organization have an interest in or a signature or other authority over a financial account (bank, securities, or other) in a foreign country? If "Yes," the organization may have to file FinCEN Form 114, Report of Foreign Bank and Financial Accounts. If "Yes," enter the name of the foreign country here
2 During the tax year, did the organization receive a distribution from, or was it the grantor of, or transferor to, a foreign trust?
If "Yes," see instructions for other forms the organization may have to file.
3 Enter the amount of tax-exempt interest received or accrued during the tax year \$ \(\qquad\)
4 Enter available pre-2018 NOL carryovers here \$ Do not include any post-2017 NOL carryover shown on Schedule A (Form 990-T). Don't reduce the NOL carryover shown here by any deduction reported on Part I, line 4.
5 Post-2017 NOL carryovers. Enter available Business Activity Code and post-2017 NOL carryovers. Don't reduce the amounts shown below by any NOL claimed on any Schedule A, Part II, line 17 for the tax year. See instructions.


\section*{\begin{tabular}{|l|l}
\hline Part V & Supplemental Information \\
\hline
\end{tabular}}

Provide the explanation required by Part IV, line 6b. Also, provide any other additional information. See instructions.


\section*{Unrelated Business Taxable Income From an Unrelated Trade or Business}
\begin{tabular}{|c|c|c|c|c|c|c|}
\hline \multicolumn{4}{|l|}{A Name of the organization THE PARKER FOUNDATION} & \multicolumn{3}{|l|}{B Employer identification number
\[
51-0141231
\]} \\
\hline C & Unrelated business activity code (see instructions) 531390 & & & D Sequence: & 1 & of 1 \\
\hline \multicolumn{7}{|l|}{E Describe the unrelated trade or business DINVESTMENT IN PARTNERSHIPS} \\
\hline & Part I Unrelated Trade or Business Income & & (A) Income & (B) Expenses & & (C) Net \\
\hline \multicolumn{2}{|l|}{\multirow[t]{6}{*}{\begin{tabular}{l}
1a Gross receipts or sales \\
b Less returns and allowances \(\qquad\) c Balance \\
2 Cost of goods sold (Part III, line 8) \\
3 Gross profit. Subtract line 2 from line 1c \(\qquad\) \\
4a Capital gain net income (attach Sch D (Form 1041 or Form 1120)). See instructions \\
b Net gain (loss) (Form 4797) (attach Form 4797). See instructions) \\
c Capital loss deduction for trusts
\end{tabular}}} & 1c & & & & \\
\hline & & 2 & & & & \\
\hline & & 3 & & & & \\
\hline & & 4a & & & & \\
\hline & & 4b & & & & \\
\hline & & 4c & & & & \\
\hline & 5 Income (loss) from a partnership or an S corporation (attach statement) & 5 & & & & \\
\hline & 6 Rent income (Part IV) & 6 & & & & \\
\hline & 7 Unrelated debt-financed income (Part V) & 7 & & & & \\
\hline & 8 Interest, annuities, royalties, and rents from a controlled organization (Part VI) & &  & & & \\
\hline & Investment income of section 501(c)(7), (9), or (17) organizations (Part VII) & & & & & \\
\hline 10 & 10 Exploited exempt activity income (Part VIII) & 10 & & & & \\
\hline 11 & 1 Advertising income (Part IX) & 11 & & & & \\
\hline & 12 Other income (see instructions; attach statement) STMT & 12 & -23,663. & & & -23,663. \\
\hline & 3 Total. Combine lines 3 through 12 & 13 & -23,663. & & & -23,663. \\
\hline
\end{tabular}

\section*{Part II Deductions Not Taken Elsewhere See instructions for limitations on deductions. Deductions must be} directly connected with the unrelated business income
\begin{tabular}{|c|c|c|c|c|}
\hline 1 & \multicolumn{2}{|l|}{Compensation of officers, directors, and trustees (Part X)} & 1 & \\
\hline 2 & \multicolumn{2}{|l|}{Salaries and wages ...............................................} & 2 & \\
\hline 3 & \multicolumn{2}{|l|}{Repairs and maintenance} & 3 & \\
\hline 4 & \multicolumn{2}{|l|}{Bad debts} & 4 & \\
\hline 5 & \multicolumn{2}{|l|}{Interest (attach statement). See instructions} & 5 & \\
\hline 6 & \multicolumn{2}{|l|}{Taxes and licenses ................................} & 6 & \\
\hline 7 & Depreciation (attach Form 4562). See instructions ........... & 7 & & \\
\hline 8 & Less depreciation claimed in Part III and elsewhere on return & 8a & 8b & \\
\hline 9 & \multicolumn{2}{|l|}{Depletion ..........................................................................} & 9 & \\
\hline 10 & \multicolumn{2}{|l|}{Contributions to deferred compensation plans} & 10 & \\
\hline 11 & \multicolumn{2}{|l|}{Employee benefit programs} & 11 & \\
\hline 12 & \multicolumn{2}{|l|}{Excess exempt expenses (Part VIII)} & 12 & \\
\hline 13 & \multicolumn{2}{|l|}{Excess readership costs (Part IX)} & 13 & \\
\hline 14 & \multicolumn{2}{|l|}{Other deductions (attach statement)} & 14 & \\
\hline 15 & \multicolumn{2}{|l|}{Total deductions. Add lines 1 through 14} & 15 & 0. \\
\hline 16 & \multicolumn{2}{|l|}{Unrelated business income before net operating loss deduction. Subtract line 15 from Part I, line 13, column (C)} & 16 & -23,663. \\
\hline 17 & \multicolumn{2}{|l|}{Deduction for net operating loss. See instructions} & 17 & 0 . \\
\hline & \multicolumn{2}{|l|}{Unrelated business taxable income. Subtract line 17 from line 16} & 18 & -23,663. \\
\hline
\end{tabular}


1 Description of property (property street address, city, state, ZIP code). Check if a dual-use. See instructions.
A \(\square\)
B \(\square\)
C \(\square\)
D \(\square\)

2 Rent received or accrued
a From personal property (if the percentage of rent for personal property is more than \(10 \%\) but not more than \(50 \%\) )
b From real and personal property (if the percentage of rent for personal property exceeds \(50 \%\) or if the rent is based on profit or income)
c Total rents received or accrued by property. Add lines \(2 a\) and 2 b , columns A through D


3 Total rents received or accrued. Add line 2c columns A through D. Enter here and on Part I, line 6, column (A) 0 . Deductions directly connected with the income
4 in lines 2(a) and 2(b) (attach statement)

5 Total deductions. Add line 4 columns A through D. Enter here and on Part I, line 6, column (B)

\section*{Part V Unrelated Debt-Financed Income (see instructions)}

1 Description of debt-financed property (street address, city, state, ZIP code). Check if a dual-use. See instructions.
\(\begin{array}{ll}\text { A } & \square \\ \text { B } & \square \\ \text { C } & \square \\ \text { D } & \square\end{array}\)

— property
3 Deductions directly connected with or allocable to debt-financed property
a Straight line depreciation (attach statement)
b Other deductions (attach statement)
c Total deductions (add lines 3a and 3b, columns A through D)
4 Amount of average acquisition debt on or allocable to debt-financed property (attach statement)
5 Average adjusted basis of or allocable to debtfinanced property (attach statement)
6 Divide line 4 by line 5
7 Gross income reportable. Multiply line 2 by line 6
A

8 Total gross income (add line 7, columns A through D). Enter here and on Part I, line 7, column (A)
\begin{tabular}{rlr} 
& \(\%\) & \(\%\) \\
& & 0 - \\
\hline
\end{tabular}
9 Allocable deductions. Multiply line 3c by line 6
10 Total allocable deductions. Add line 9, columns A through D. Enter here and on Part I, line 7, column (B)
Total dividends-received deductions included in line 10




Schedule A (Form 990-T) 2021

Schedule A (Form 990-T) 2021
Total. Enter here and on Part II, line 1
\begin{tabular}{c|c|c} 
& \begin{tabular}{c} 
3. Percentage \\
of time devoted \\
to business
\end{tabular} & \begin{tabular}{c} 
4. Compensation \\
attributable to \\
unrelated business
\end{tabular} \\
\hline\(\%\) & \\
& \(\%\) & \\
\hline & \(\%\) & \\
\hline & & \\
\hline
\end{tabular}

Part XI Supplemental Information (see instructions)
\begin{tabular}{lc}
\hline \hline FORM 990-T (A) & OTHER INCOME
\end{tabular} STATEMENT 12


\section*{City or town, state, and ZIP code or country}

\section*{CARLSBAD, CA 92008}

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) s Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\[
\begin{array}{|l|l}
\hline \text { Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) } & \text { Employer identification number (if any) }
\end{array}
\]
SLP VI CAYMAN LINE FEEDER, L.P.
C/O MAPLES CORPORATE SERVICES LTD

Address (Enter number, street, city or town, and country.)

\section*{98-1542919}

Reference ID number (see instructions)
P.O. BOX 309, UGLAND HOUSE

GRAND CAYMAN, CAYMAN ISLANDS KY1-1104
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: LIMITED UNITS
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) \(\square \$ 0-50,000\)
(b)
\$50,001-100,000
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)

5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) X Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 13

\section*{Part II Elections (see instructions)}

A X Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part \(V\).
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.
04-01-21 LHA For Disclosure, Privacy Act, and Paperwork Reduction Act Notice, see separate instructions.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
\begin{tabular}{|c|l}
\hline \(15 a\) & \\
\hline & \\
\hline 15 b & \\
\hline 15 c & \\
\hline 15 d & \\
\hline & \\
\hline 15 e & \\
\hline 15 f & \\
\hline & \\
\hline 16 b & \\
\hline 16 c & \\
\hline 16 d & \\
\hline 16 e & \\
\hline & \\
\hline \(16 f\) & \\
\hline
\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

CARLSBAD, CA 92008

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\[
\begin{array}{l|l}
\hline \text { Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) } & \text { Employer identification number (if any) }
\end{array}
\]

\section*{C6 LF HOLDINGS, L.P.}

Address (Enter number, street, city or town, and country.)
98-1636512

\section*{199 BAY STREET, SUITE 5300}

TORONTO, ONTARIO, CANADA M5L 1B9
Reference ID number (see instructions)
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning NOV 92021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: LIMITED UNITS
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) X Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 14

\section*{Part II Elections (see instructions)}

A X Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline 16 d & \\
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
DLOCAL LTD

Address (Enter number, street, city or town, and country.)

\section*{1294 MONTEVIDEO}

URUGUAY CP 11300

Employer identification number (if any)

Reference ID number (see instructions) 001
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning FEB 102021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: CLASS A
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year: \(\qquad\) 28,533
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) \(\square \$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)

5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 15

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part Ill is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15 f of Part \(V\).
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post- 1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline 16 e & \\
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

> \begin{tabular}{|l|l|} \hline Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any) \end{tabular}

\section*{GRANITE PARENT S.A.R.L.}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions)
GRANITEPSARL
20 RUE EUGENE
RUPPER, LUXEMBOURG L-2453

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
\(\qquad\) (c) \(\$ 100,001-150,00\)
(e) If more than \(\$ 200,000\), list value:

5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$
\[
\text { SEE STATEMENT } 16
\]

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post- 1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

CARLSBAD, CA 92008

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l} 
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) \\
TPG ASIA VI DFI AIV 1, LP & Employer identification number (if any) \\
\hline Address (Enter number, street, city or town, and country.) & \(98-1047872\) \\
UGLAND HOUSE, P.O.BO & Reference ID number (see instructions) \\
GRAND CAYMAN, CAYMAN ISLANDS KY1-1104 & \begin{tabular}{l} 
Tax year of foreign corporation, PFIC, or QEF: Calendar year \\
or other tax year beginning JAN 1 \\
and ending
\end{tabular} \\
\hline
\end{tabular}

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: OTHER
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 17

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part \(V\).
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
\begin{tabular}{|c|l}
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\hline 16 c & \\
\hline 16 d & \\
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

CARLSBAD, CA 92008

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l}
\hline Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any)
\end{tabular}
CHINA MEDIA (CAYMAN), LTD

\section*{98-1046807}

Address (Enter number, street, city or town, and country.)
UGLAND HOUSE, P.O.BO
GRAND CAYMAN, CAYMAN ISLANDS KY1-1104

Reference ID number (see instructions)
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\$50,001-100,000
(c)
\$100,001-150,000
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

\section*{SEE STATEMENT 18}

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part \(V\).
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline 16 c & \\
\hline 16 d & \\
\hline 16 e & \\
\hline & \\
\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

CARLSBAD, CA 92008

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l}
\hline Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) \\
TPG RAFTER (CAYMAN), LTD & Employer identification number (if any) \\
\hline Address (Enter number, street, city or town, and country.) & \(98-1172794\) \\
UGLAND HOUSE, P.O.BO & Reference ID number (see instructions) \\
GRAND CAYMAN, CAYMAN ISLANDS KY1-1104 & \begin{tabular}{l} 
Tax year of foreign corporation, PFIC, or QEF: Calendar year \\
or other tax year beginning JAN 1. \\
and ending
\end{tabular} \\
\hline
\end{tabular}

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\$50,001-100,000
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(d) \(\square\) 150,001200,00
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 19

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part \(V\).
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


Employer identification number (if any)

\section*{VIETNAM AUSTRALIA INTERNATIONAL}

Address (Enter number, street, city or town, and country.)

\section*{594 BA THANG HAI}

Reference ID number (see instructions) VIETNAMAI
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \$0-50,000
(b)
\$50,001-100,000
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(d)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 20

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8 a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6 a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line \(15 e\) of Part \(V\). If the excess distribution is greater than zero, also complete line 16 of Part V.
F Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


City or town, state, and ZIP code or country
CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l} 
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any)
\end{tabular}

\section*{XCL EDUCATION PTE. LTD}

Reference ID number (see instructions) XCLEPL
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 21

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline \(16 f\) & \\
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

CARLSBAD, CA 92008

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l}
\hline Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) \\
TPG DRONE BL, LP & Employer identification number (if any) \\
\hline Address (Enter number, street, city or town, and country.) & \(98-1202686\) \\
P.O. BOX 309, UGLAND HOUSE & Reference ID number (see instructions) \\
GRAND CAYMAN, CAYMAN ISLANDS KY1-1004 & \begin{tabular}{l} 
Tax year of foreign corporation, PFIC, or QEF: Calendar year \\
or other tax year beginning JAN 1. \\
and ending
\end{tabular} \\
\hline
\end{tabular}

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: OTHER
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\$50,001-100,000
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 22

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\quad \square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part \(V\).


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) \\ Employer identification number (if any)}

TPG INDONESIA II, LTD

Address (Enter number, street, city or town, and country.)
301 COMMERCE STREET, BOX 3444
FORT WORTH, TX 76102

\section*{98-0583383}

Reference ID number (see instructions)

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 23

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\quad \square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \mathrm{X}\) Corporation \(\quad \square\) Partnership \(\quad \square\) s Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l} 
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any)
\end{tabular}

\section*{SALVITAS LIMITED (CAYMAN)}

Address (Enter number, street, city or town, and country.)

Reference ID number (see instructions) SALVITALC
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021, and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

\section*{SEE STATEMENT 24}

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part Ill is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part \(V\).
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{SALVITAS INVESTMENTS, INC}

Employer identification number (if any)

Reference ID number (see instructions) SALVITAII
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021, and ending DEC 31,2021

DEC 31,2021.

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(d)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 25

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \mathrm{X}\) Corporation \(\quad \square\) Partnership \(\quad \square\) s Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)

\section*{CANOPUS OECONOMUS LTD}

Address (Enter number, street, city or town, and country.)
PORTCULLIS TRUSTNET P.O. BOX 3444
ROAD TOWN, BRITISH VIRGIN ISLANDS VG1110

Employer identification number (if any)

Reference ID number (see instructions) CANOPUSOL
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 26

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294(c) and 1294(f) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

> \begin{tabular}{|l|ll} \hline Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any) \end{tabular}

\section*{MENHIR INVESTMENT HOLDINGS LIM}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions)

\section*{MENHIRIHL}

FLAT/RM D 3F THOMSON THOMSON RD
HONG KONG, CHINA

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: VARIOUS
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\$100,001-150,000
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 27

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part \(V\).
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \mathrm{X}\) Corporation \(\quad \square\) Partnership \(\quad \square\) s Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\begin{tabular}{l|l} 
Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any)
\end{tabular}

\section*{CANOPUS ASSECURATIO LIMITED}

Reference ID number (see instructions)

\section*{CANOPUSAL}

Address (Enter number, street, city or town, and country.)

Tax year of foreign corporation, PFIC, or QEF: Calendar year
PORTCULLIS TRUSTNET P.O. BOX 3444
ROAD TOWN, BRITISH VIRGIN ISLANDS VG1110

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 28

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)

\section*{KAKAO MOBILITY CORPORATION}

Address (Enter number, street, city or town, and country.)

\section*{FLOOR 13, PANGYOYEOK}

B SEONGNAM-SI, SOUTH KOREA

Employer identification number (if any)

Reference ID number (see instructions) KAKAOMC
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 29

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections \(1294(\mathrm{c})\) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


City or town, state, and ZIP code or country
CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\[
\begin{array}{|l|ll}
\hline \text { Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) } & \text { Employer identification number (if any) }
\end{array}
\]
PROPERTY GURU PTE. LTD.

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions)

\section*{PROPERTYGPT}

PAYA LEBAR QUARTER 1
PAYA LEBA, SINGAPORE

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
\(\qquad\)


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


City or town, state, and ZIP code or country
CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
TPG INDOLE, LP

Address (Enter number, street, city or town, and country.)
MAPLES CORPORATE SER BOX 39, UGLAND HOUSE GRAND CAYMAN, CAYMAN ISLANDS

Employer identification number (if any)

Reference ID number (see instructions)

\section*{TPGINDLP}

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: OTHER
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c) \(\square \$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
\(\qquad\) (c) \(\$ 100,001-150,000\)
(e) If more than \(\$ 200,000\), list value:

5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 31

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15 f of Part \(V\).
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post- 1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

\section*{CARLSBAD, CA 92008}

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
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Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)
Employer identification number (if any)

```

\section*{JETANIN COMPANY LIMITED}

Address (Enter number, street, city or town, and country.)

Reference ID number (see instructions) JETCOMLIM
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \$0-50,000
(b)
\$50,001-100,000
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 SOI CHIDLOM PLOENC LBANGKOK, THAILAND

5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293 , and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 32

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part Ill is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15 f of Part \(V\).
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post- 1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section \(1.1298-3\) (d). Enter the excess distribution on line \(15 e\), Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.

Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \mathrm{X}\) Corporation \(\quad \square\) Partnership \(\quad \square\) s Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\[
\begin{array}{|l|ll}
\hline \text { Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) } & \text { Employer identification number (if any) }
\end{array}
\]

\section*{ZHAOKE OPHTHALMOLOGY LIMITED}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions) ZHOOPHLIM
190 ELGIN AVENUE GRA CAYMAN
Tax year of foreign corporation, PFIC, or QEF: Calendar year GEORGE TOWN, CAYMAN ISLANDS or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 33

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


City or town, state, and ZIP code or country
CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)

\section*{SHANGHAI BIO-HEART BIOLOGIC TE}

Address (Enter number, street, city or town, and country.)
ROOM 302, 3/F BUILD SHANGHAI, CHINA

Employer identification number (if any)

Reference ID number (see instructions)

\section*{SBIOHEBT}

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 34

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


City or town, state, and ZIP code or country
CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions
\[
\begin{array}{|l|ll}
\hline \text { Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) } & \text { Employer identification number (if any) }
\end{array}
\]

\section*{SHANGHAI ARK BIOPHARMACEUTICAL}

Address (Enter number, street, city or town, and country.)

\section*{Reference ID number (see instructions)}

\section*{SHAARKBIO}

BUILDING 25 LANE 388
SHANGHAI, PRC, CHINA
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\$50,001-100,000
(c)
\$100,001-150,000
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 35

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15 e of Part V . If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

> \begin{tabular}{|l|l|} \hline Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF) & Employer identification number (if any) \end{tabular}

\section*{RELIANCE RETAIL VENTURES LIMITED}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions)

\section*{RELRETVL}

3RD FLOOR, COURT HOU TALAO
MUMBAI, INDIA 400002

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 36

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{City or town, state, and ZIP code or country}

CARLSBAD, CA 92008
Check type of shareholder filing the return: \(\quad \square\) Individual \(\quad \overline{\mathrm{X}}\) Corporation \(\quad \square\) Partnership \(\quad \square\) S Corporation \(\quad \square\) Nongrantor Trust \(\quad \square\) Estate Check if any Excepted Specified Foreign Financial Assets are reported on this form. See instructions
Qualifying Insurance Corporation Election-I, a shareholder of stock of a foreign corporation, elect to treat such stock as the stock of a Qualifying Insurance Corporation under the alternative facts and circumstances test within the meaning of section 1297(f)(2). See instructions

Name of foreign corporation, passive foreign investment company (PFIC), or qualified electing fund (QEF)

\section*{KANGJI MEDICAL HOLDINGS LIMITED}

Address (Enter number, street, city or town, and country.)
1668 CHUNJIANG EAST ECONO
HANGZHOU, CHINA 311501

> Employer identification number (if any)

Reference ID number (see instructions)

\section*{KANMEDHL}

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section \(1291 \$\)
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 37

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{HANGZHOU KANGJI QIQU MEDICAL I}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions) HANGZHOUKQM
1668 CHUNJIANG EAST HOU
HANGZHOU, CHINA 311501

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 38

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{HANGZHOU KANGJI YINRUI MEDICAL}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions) HANGZHOUKANYM
1668 CHUNJIANG EAST HOU
HANGZHOU, CHINA 311501

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 39

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


Reference ID number (see instructions) HANGZHOUKMEDI
Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 , and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
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\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 40

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
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\hline 16 e & \\
\hline & \\
\hline \(16 f\) & \\
\hline
\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\section*{HANGZHOU KANGJI SUIXI MEDICAL}

Address (Enter number, street, city or town, and country.)
Reference ID number (see instructions) HANGZHOUKANSUM
1668 CHUNJIANG EAST HOU
HANGZHOU, CHINA 311501

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \$
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 41

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
\begin{tabular}{|c|l}
\hline \(15 a\) & \\
\hline & \\
\hline 15 b & \\
\hline 15 c & \\
\hline 15 d & \\
\hline & \\
\hline 15 e & \\
\hline 15 f & \\
\hline & \\
\hline 16 b & \\
\hline 16 c & \\
\hline 16 d & \\
\hline 16 e & \\
\hline & \\
\hline \(16 f\) & \\
\hline
\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


Reference ID number (see instructions)
JIANGXIKME

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 12021 ,
and ending \(\quad\) DEC 31,2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 42

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line \(15 f\) of Part V.
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
\begin{tabular}{|c|l}
\hline \(15 a\) & \\
\hline & \\
\hline 15 b & \\
\hline 15 c & \\
\hline 15 d & \\
\hline & \\
\hline 15 e & \\
\hline 15 f & \\
\hline & \\
\hline 16 b & \\
\hline 16 c & \\
\hline 16 d & \\
\hline 16 e & \\
\hline & \\
\hline \(16 f\) & \\
\hline
\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


Reference ID number (see instructions)

\section*{HANGZHOUKANGMEDE}

Tax year of foreign corporation, PFIC, or QEF: Calendar year or other tax year beginning JAN 1 2021,
and ending \(\quad\) DEC 31, 2021

\section*{Part I Summary of Annual Information (see instructions)}

Provide the following information with respect to all shares of the PFIC held by the shareholder:
1 Description of each class of shares held by the shareholder: COMMON
\(\square\) Check if shares jointly owned with spouse.
2 Date shares acquired during the tax year, if applicable:
3 Number of shares held at the end of the tax year:
4 Value of shares held at the end of the tax year (check the appropriate box, if applicable):
(a) X \(\$ 0-50,000\)
(b)
\(\$ 50,001-100,000\)
(c)
\(\$ 100,001-150,000\)
(d) \(\square \$ 150,001-200,000\)
(d)
(e) If more than \(\$ 200,000\), list value: \(\qquad\)
5 Type of PFIC and amount of any excess distribution or gain treated as an excess distribution under section 1291, inclusion under section 1293, and inclusion or deduction under section 1296 (check all boxes that apply):
(a) \(\square\) Section 1291 \$
(b) \(\square\) Section 1293 (Qualified Electing Fund) \(\$\)
(c) \(\square\) Section 1296 (Mark to Market) \$

SEE STATEMENT 43

\section*{Part II Elections (see instructions)}

A \(\square\) Election To Treat the PFIC as a QEF. I, a shareholder of a PFIC, elect to treat the PFIC as a QEF. Complete lines 6a through 7c of Part III.
B \(\square\) Election To Extend Time For Payment of Tax. I, a shareholder of a QEF, elect to extend the time for payment of tax on the undistributed earnings and profits of the QEF until this election is terminated. Complete lines 8a through 9c of Part III to calculate the tax that may be deferred. Note: If any portion of line 6a or line 7a of Part III is includible under section 951, you may not make this election. Also, see sections 1294( c ) and \(1294(\mathrm{f})\) and the related regulations for events that terminate this election.
C \(\square\) Election To Mark-to-Market PFIC Stock. I, a shareholder of a PFIC, elect to mark-to-market the PFIC stock that is marketable within the meaning of section 1296(e). Complete Part IV.
D \(\square\) Deemed Sale Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF, elect to recognize gain on the deemed sale of my interest in the PFIC. Enter gain or loss on line 15 f of Part \(V\).
E \(\square\) Deemed Dividend Election. I, a shareholder on the first day of a PFIC's first tax year as a QEF that is a controlled foreign corporation (CFC), elect to treat an amount equal to my share of the post-1986 earnings and profits of the CFC as an excess distribution. Enter this amount on line 15e of Part V. If the excess distribution is greater than zero, also complete line 16 of Part \(V\).
F \(\square\) Election To Recognize Gain on Deemed Sale of PFIC. I, a shareholder of a former PFIC or a PFIC to which section 1297(d) applies, elect to treat as an excess distribution the gain recognized on the deemed sale of my interest in the PFIC on the last day of its last tax year as a PFIC under section 1297(a). Enter gain on line \(15 f\) of Part \(V\).
G \(\square\) Deemed Dividend Election With Respect to a Section 1297(e) PFIC. I, a shareholder of a section 1297(e) PFIC, within the meaning of Regulations section 1.1297-3(a), elect to make a deemed dividend election with respect to the Section 1297(e) PFIC. My holding period in the stock of the Section 1297(e) PFIC includes the CFC qualification date, as defined in Regulations section 1.1297-3(d). Enter the excess distribution on line \(15 e\), Part \(V\). If the excess distribution is greater than zero, also complete line 16, Part V.
H \(\square\) Deemed Dividend Election With Respect to a Former PFIC. I, a shareholder of a former PFIC, within the meaning of Regulations section 1.1298-3(a), elect to make a deemed dividend election with respect to the former PFIC. My holding period in the stock of the former PFIC includes the termination date, as defined in Regulations section 1.1298-3(d). Enter the excess distribution on line 15 e, Part V. If the excess distribution is greater than zero, also complete line 16, Part V.


\section*{Part V Distributions From and Dispositions of Stock of a Section 1291 Fund (see instructions)}

Complete a separate Part V for each excess distribution and disposition. See instructions.
15 a Enter your total distributions from the section 1291 fund during the current tax year with respect to the applicable stock. If the holding period of the stock began in the current tax year, see instructions
b Enter the total distributions (reduced by the portions of such distributions that were excess distributions but not included in income under section 1291(a)(1)(B)) made by the fund with respect to the applicable stock for each of the 3 years preceding the current tax year (or if shorter, the portion of the shareholder's holding period before the current tax year)
c Divide line 15b by 3.0. (See instructions if the number of preceding tax years is less than 3. )
d Multiply line 15 c by \(125 \%\) (1.25)
e Subtract line 15d from line 15a. This amount, if more than zero, is the excess distribution with respect to the applicable stock. If there is an excess distribution, complete line 16. If zero or less and you did not dispose of stock during the tax year, do not complete the rest of Part V. See instructions if you received more than one distribution during the current tax year. Also, see instructions for rules for reporting a nonexcess distribution on your income tax return
\begin{tabular}{|c|l}
\hline \(15 a\) & \\
\hline & \\
\hline 15 b & \\
\hline 15 c & \\
\hline 15 d & \\
\hline & \\
\hline 15 e & \\
\hline 15 f & \\
\hline & \\
\hline 16 b & \\
\hline 16 c & \\
\hline 16 d & \\
\hline 16 e & \\
\hline & \\
\hline \(16 f\) & \\
\hline
\end{tabular}

Form 8621 (Rev. 12-2018)

\section*{Part VI Status of Prior Year Section 1294 Elections and Termination of Section 1294 Elections}

Complete a separate column for each outstanding election.


\begin{tabular}{llll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 14 \\
\hline NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
DLOCAL LTD
\begin{tabular}{|c|c|c|c|c|c|c|c|c|}
\hline \multicolumn{3}{|l|}{\multirow[t]{3}{*}{}} & \multicolumn{3}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & & & OF SHARES & & CHANGE & & OF SHARES & SHARES HELD \\
\hline & & & AT BEGINING & IN & NUMBER & DATE OF & AT END & AT END \\
\hline CLASS & OF & STOCK & OF YEAR & OF & SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline CLASS & A & & . 000 & & ,533.000 & & 28,533.000 & 1018343.00 \\
\hline
\end{tabular}



NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
CHINA MEDIA (CAYMAN), LTD
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 3.00 \\
\hline
\end{tabular}
\begin{tabular}{ll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
TPG RAFTER (CAYMAN), LTD
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & NUMBER & \multirow[b]{2}{*}{CHANGE} & & NUMBER & VALUE OF \\
\hline & OF SHARES & & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 15.00 \\
\hline
\end{tabular}
\begin{tabular}{llll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 20 \\
\hline NAME OF PASSIVE FOREIGN INVESTMENT
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
XCL EDUCATION PTE. LTD
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 1.00 \\
\hline
\end{tabular}
\begin{tabular}{lll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION & STATEMENT 22
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
TPG DRONE BL, LP
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline OTHER & . 000 & & & & 43.00 \\
\hline
\end{tabular}


NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
SALVITAS LIMITED (CAYMAN)
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 6.00 \\
\hline
\end{tabular}
\begin{tabular}{ll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
SALVITAS INVESTMENTS, INC
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & NUMBER & \multirow[b]{2}{*}{CHANGE} & & NUMBER & VALUE OF \\
\hline & OF SHARES & & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 6.00 \\
\hline
\end{tabular}
\begin{tabular}{llll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 26 \\
\hline NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
MENHIR INVESTMENT HOLDINGS LIM
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline VARIOUS & . 000 & & & & 6.00 \\
\hline
\end{tabular}



NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
PROPERTY GURU PTE. LTD.
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & 1.000 & & 1.000 & 132.00 \\
\hline
\end{tabular}
\begin{tabular}{lll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION & STATEMENT 31 \\
\hline
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
TPG INDOLE, LP



NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
ZHAOKE OPHTHALMOLOGY LIMITED
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & 5.000 & 3.00 \\
\hline
\end{tabular}
\begin{tabular}{lll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION & STATEMENT 34 \\
\hline
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
SHANGHAI BIO-HEART BIOLOGIC TE
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & 3.000 & 9.00 \\
\hline
\end{tabular}


NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
RELIANCE RETAIL VENTURES LIMITED
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 2.00 \\
\hline
\end{tabular}

\begin{tabular}{|c|c|c|c|}
\hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 38 \\
\hline NAME OF PASSIVE & FOREIGN INVESTMENT COMPANY OR QUALIFIED & ELECTING F & \\
\hline \multicolumn{4}{|l|}{HANGZHOU KANGJI QIQU MEDICAL I} \\
\hline CLASS OF STOCK &  & NUMBER OF SHARES AT END OF YEAR & VALUE OF
SHARES HELD
AT END
OF YEAR \\
\hline COMMON & . 000 & & 11.00 \\
\hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 39 \\
\hline
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
HANGZHOU KANGJI YINRUI MEDICAL

\begin{tabular}{ll}
\hline \hline FORM 8621 & ADDITIONAL INFORMATION
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
HANGZHOU KANGQU MEDICAL INSTRUMENT
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 6.00 \\
\hline
\end{tabular}
\begin{tabular}{|c|c|c|c|}
\hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 41 \\
\hline NAME OF PASSIVE & FOREIGN INVESTMENT COMPANY OR & ELECTING F & \\
\hline HANGZHOU KANGJI & SUIXI MEDICAL & & \\
\hline CLASS OF STOCK &  & NUMBER OF SHARES AT END OF YEAR & VALUE OF SHARES HELD AT END OF YEAR \\
\hline COMMON & . 000 & & 1.00 \\
\hline FORM 8621 & ADDITIONAL INFORMATION & & STATEMENT 42 \\
\hline
\end{tabular}

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
JIANGXI KANGHUAN MEDICAL EQUIPMENT

FORM 8621 ADDITIONAL INFORMATION \(\quad\) STATEMENT 43

NAME OF PASSIVE FOREIGN INVESTMENT COMPANY OR QUALIFIED ELECTING FUND
HANGZHOU KANGJI MEDICAL EQUIPMENT
\begin{tabular}{|c|c|c|c|c|c|}
\hline \multirow[t]{3}{*}{} & \multicolumn{2}{|l|}{NUMBER} & & NUMBER & VALUE OF \\
\hline & OF SHARES & CHANGE & & OF SHARES & SHARES HELD \\
\hline & AT BEGINING & IN NUMBER & DATE OF & AT END & AT END \\
\hline CLASS OF STOCK & OF YEAR & OF SHARES & CHANGE & OF YEAR & OF YEAR \\
\hline COMMON & . 000 & & & & 58.00 \\
\hline
\end{tabular}

\begin{tabular}{l|lll}
\hline Controlling shareholder & & Identifying number \\
\hline & & & \\
\hline & & & \\
\hline & & & \\
\hline
\end{tabular}


\section*{Part II Transferee Foreign Corporation Information (see instructions)}
\begin{tabular}{l|l}
\hline 4 Name of transferee (foreign corporation) & 5a Identifying number, if any \\
SLP VI CAYMAN LINE FEEDER, L.P. & 981542919 \\
\hline 6 Address (including country) & 5b Reference ID number \\
P.O. BOX 309, UGLAND HOUSE \\
GRAND CAYMAN, KY1-1104 CAYMAN ISLANDS
\end{tabular}

7 Country code of country of incorporation or organization

8 Foreign law characterization (see instructions)
LIMITED PARTNERSHIP

\begin{tabular}{llll}
124531 04-01-21 & LHA & For Paperwork Reduction Act Notice, see separate instructions. & Form 926 (Rev. 11-2018)
\end{tabular}

\section*{\begin{tabular}{|l|l|}
\hline Part III & Information Regarding Transfer of Property (see instructions)
\end{tabular}}

\section*{Section A - Cash}
\begin{tabular}{l|c|c|c|c|c}
\hline \begin{tabular}{c} 
Type of \\
property
\end{tabular} & \begin{tabular}{c} 
(a) \\
Date of \\
transfer
\end{tabular} & \begin{tabular}{c} 
(b) \\
Description of \\
property
\end{tabular} & \begin{tabular}{c} 
(c) \\
Fair market value on \\
date of transfer
\end{tabular} & \begin{tabular}{c} 
(d) \\
Cost or other \\
basis
\end{tabular} & \begin{tabular}{c} 
(e) \\
Cash recognized on \\
transfer
\end{tabular} \\
\hline \(\mathbf{1 0 ~} \quad\)\begin{tabular}{l} 
Was cash the only property transferred? \\
If "Yes," skip the remainder of Part III and go to Part IV......................................................................
\end{tabular} & \\
\hline
\end{tabular}

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


\section*{Section C - Intangible Property Subject to Section 367(d)}
\begin{tabular}{l|l|l|l|l|l|l}
\hline \multirow{2}{*}{\begin{tabular}{c} 
Type of \\
property
\end{tabular}} & \begin{tabular}{c} 
(a) \\
Date of \\
transfer
\end{tabular} & \begin{tabular}{c} 
(b) \\
Description of \\
property
\end{tabular} & \begin{tabular}{c} 
(c) \\
Useful \\
life
\end{tabular} & \begin{tabular}{c} 
(d) \\
Arm's length price \\
on date of transfer
\end{tabular} & \begin{tabular}{c} 
(e) \\
Cost or other \\
basis
\end{tabular} \\
\hline & & & & & \\
\hline
\end{tabular}

14 a 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
b At the time of the transfer, did any of the transferred intangible property have an indefinite useful life?YesNo

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?YesNo
d If the answer to line 14 c 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)
\$ \(\qquad\)
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)?YesNo

\section*{Supplemental Part III Information Required To Be Reported (see instructions) \\ \begin{tabular}{|l|l} 
Part IV & Additional Information Regarding Transfer of Property (see instructions) \\
\hline
\end{tabular}}

16 Enter the transferor's interest in the transferee foreign corporation before and after the transfer.
(a) Before \(\qquad\) . 120 \%
(b) After \(\qquad\)

17 Type of nonrecognition transaction (see instructions)
18 Indicate whether any transfer reported in Part III is subject to any of the following.
a Gain recognition under section 904(f)(3)
b Gain recognition under section 904(f)(5)(F)

\(\qquad\)
\begin{tabular}{|c|c|c|}
\hline Yes & X & No \\
\hline Yes & X & No \\
\hline Yes & X & No \\
\hline Yes & X & No \\
\hline Yes & X & No \\
\hline Yes & X & \\
\hline
\end{tabular}

19 Did this transfer result from a change in entity classification? .......................................................................
20 a Did a domestic corporation make a distribution of property covered by section 367 (e)(2)? (see instructions) If "Yes," complete lines 20b and 20c.
b Enter the total amount of gain or loss recognized pursuant to Regulations section 1.367(e)-2(b)
- \$ \(\qquad\)
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)?
YesNo
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

Form 926 (Rev. 11-2018)

\section*{TAX RETURN FILING INSTRUCTIONS}

CALIFORNIA FORM 199
FOR THE YEAR ENDING
SEPTEMBER 30, 2022

\section*{PREPARED FOR:}

THE PARKER FOUNDATION
2604-B EL CAMINO REAL, SUITE 244
CARLSBAD, CA 92008

\section*{PREPARED BY:}

EISNER ADVISORY GROUP LLC
4225 EXECUTIVE SQUARE, SUITE 1150
LA JOLLA, CA 92037

TO BE SIGNED AND DATED BY:


MAKE CHECK PAYABLE TO:
NOT APPLICABLE
MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:
THIS RETURN HAS QUALIFIED FOR ELECTRONIC FILING. PLEASE REVIEW THE RETURN FOR COMPLETENESS AND ACCURACY. WE WILL THEN TRANSMIT YOUR RETURN ELECTRONICALLY TO THE FTB. DO NOT MAIL THE PAPER COPY OF THE RETURN TO THE FTB.

RETURN MUST BE MAILED ON OR BEFORE:
NOT APPLICABLE
SPECIAL INSTRUCTIONS:

\title{
TAX RETURN FILING INSTRUCTIONS
}

CALIFORNIA FORM 109
FOR THE YEAR ENDING
SEPTEMBER 30, 2022

\section*{PREPARED FOR:}

THE PARKER FOUNDATION
2604-B EL CAMINO REAL, SUITE 244
CARLSBAD, CA 92008

\section*{PREPARED BY:}

EISNER ADVISORY GROUP LLC
4225 EXECUTIVE SQUARE, SUITE 1150
LA JOLLA, CA 92037

TO BE SIGNED AND DATED BY:


MAKE CHECK PAYABLE TO:
NOT APPLICABLE
MAIL TAX RETURN AND CHECK (IF APPLICABLE) TO:
FRANCHISE TAX BOARD
P.O. BOX 942857

SACRAMENTO, CA 94257-0500

RETURN MUST BE MAILED ON OR BEFORE:
AUGUST 15, 2023
SPECIAL INSTRUCTIONS:

\section*{TAX RETURN FILING INSTRUCTIONS}

CALIFORNIA FORM RRF-1
FOR THE YEAR ENDING
SEPTEMBER 30, 2022

\section*{PREPARED FOR:}

THE PARKER FOUNDATION
2604-B EL CAMINO REAL, SUITE 244
CARLSBAD, CA 92008

\section*{PREPARED BY:}

EISNER ADVISORY GROUP LLC
4225 EXECUTIVE SQUARE, SUITE 1150
LA JOLLA, CA 92037

\section*{AMOUNT OF TAX:}

BALANCE DUE OF \$200


RETURN MUST BE MAILED ON OR BEFORE:
AUGUST 15, 2023

\section*{SPECIAL INSTRUCTIONS:}

THE REPORT SHOULD BE SIGNED AND DATED BY AN AUTHORIZED INDIVIDUAL(S).

A COPY OF THE FEDERAL RETURN IS ALSO PROVIDED. IN CONJUNCTION WITH FORM RRF-1 THIS COMPRISES THE ANNUAL REPORT TO BE FILED WITH THE CALIFORNIA ATTORNEY GENERAL'S REGISTRY OF CHARITABLE TRUSTS.

A COMPLETED AND SIGNED COPY OF THE FEDERAL FORM 990-PF (AND ALL APPLICABLE ATTACHMENTS) MUST BE INCLUDED WITH FORM RRF-1.



Part II Organizations with gross receipts of more than \(\$ 50,000\) and private foundations regardless of amount of gross receipts - complete Part II or furnish substitute information.

SEE PART II SUBSTITUTE ATTACHMENT
\begin{tabular}{l}
\hline \\
\hline
\end{tabular}

\section*{Schedule M-1 Reconciliation of income per books with income per return}

Do not complete this schedule if the amount on Schedule L, line 13, column (d), is less than \$50,000.

\begin{tabular}{llc}
\hline\(\frac{\text { TAXABLE YEAR }}{2021}\) & \begin{tabular}{l} 
California e-file Return Authorization for \\
Exempt Organizations
\end{tabular} & \(\frac{\text { FORM }}{\mathbf{8 4 5 3 - E O}}\) \\
\hline
\end{tabular}
\begin{tabular}{|c|c|}
\hline Exempt Organization name & Identifying number \\
\hline THE PARKER FOUNDATION & 51-0141231 \\
\hline \multicolumn{2}{|l|}{Part I Electronic Return Information (whole dollars only)} \\
\hline 1 Total gross receipts (Form 199, line 4) & 7,624,968 \\
\hline 2 Total gross income (Form 199, line 8) & 2 3,461,493 \\
\hline 3 Total expenses and disbursements (Form 199, line 9) & \(3 \ldots 2\) \\
\hline
\end{tabular}
\begin{tabular}{lllllll}
\hline Part II & Settle Your Account Electronically for Taxable Year 2021 & & \\
\hline \(\mathbf{4}\) & Electronic funds withdrawal & 4a Amount & 4b & \\
\hline Part III & Banking Information (Have you verified the exempt organization's banking information?) & & \\
\hline \(\mathbf{5}\) Routing number & & & & & \\
6 & & Account number & & 7 & Type of account: & Checking
\end{tabular}

\section*{Part IV Declaration of Officer}

I authorize the exempt organization's account to be settled as designated in Part II. If I check Part II, box 4, I authorize an electronic funds withdrawal for the amount listed on line 4a.
Under penalties of perjury, I declare that I am an officer of the above exempt organization and that the information I provided to my electronic return originator (ERO), transmitter, or intermediate service provider and the amounts in Part I above agree with the amounts on the corresponding lines of the exempt organization's 2021 California electronic return. To the best of my knowledge and belief, the exempt organization's return is true, correct, and complete. If the exempt organization is filing a balance due return, I understand that if the Franchise Tax Board (FTB) does not receive full and timely payment of the exempt organization's fee liability, the exempt organization will remain liable for the fee liability and all applicable interest and penalties. I authorize the exempt organization return and accompanying schedules and statements be transmitted to the FTB by the ERO, transmitter, or intermediate service provider. If the processing of the exempt organization's return or refund is delayed, I authorize the FTB to disclose to the ERO or intermediate service provider the reason(s) for the delay.

Sign


\section*{Part V Declaration of Electronic Return Originator (ERO) and Paid Preparer.}

I declare that I have reviewed the above exempt organization's return and that the entries on form FTB 8453 -EO are complete and correct to the best of my knowledge. (If I am only an intermediate service provider, I understand that I am not responsible for reviewing the exempt organization's return. I declare, however, that form FTB 8453-EO accurately reflects the data on the return.) I have obtained the organization officer's signature on form FTB 8453-E0 before transmitting this return to the FTB; I have provided the organization officer with a copy of all forms and information that I will file with the FTB, and I have followed all other requirements described in FTB Pub. 1345, 2021 Handbook for Authorized e-file Providers. I will keep form FTB 8453-EO on file for four years from the due date of the return or four years from the date the exempt organization return is filed, whichever is later, and I will make a copy available to the FTB upon request. If I am also the paid preparer, under penalties of perjury, I declare that I have examined the above exempt organization's return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I make this declaration based on all information of which I have knowledge.


Under penalties of perjury, I declare that I have examined the above organization's return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. I make this declaration based on all information of which I have knowledge.

\begin{tabular}{ll|l}
\hline Calendar Year 2021 or fiscal year beginning (mm/dd/yyyy) & \(10 / 01 / 2021\) & , and ending (mm/dd/yyyy) \\
\hline Corporation/Organization name & \(09 / 30 / 2022\) \\
THE PARKER FOUNDATION & & California corporation number \\
\hline Additional information. See instructions. & C0733820 \\
& & FEIN \\
\hline
\end{tabular}



\section*{Schedule A Cost of Goods Sold and/or Operations.}


\section*{Schedule B Tax Credits.}


\section*{Schedule R Apportionment Formula Worksheet. Use only for unrelated trade or business amounts.}

Part A. Standard Method - Single-Sales Factor Formula. Complete this part only if the corporation uses the single-sales factor formula.


\section*{Schedule C Rental Income from Real Property and Personal Property Leased with Real Property}


\footnotetext{
Add columns 4(b) and column 5(c). Enter here and on Side 2, Part I, line 6
}

Schedule D Unrelated Debt-Financed Income
\begin{tabular}{l}
\hline 1 Description of debt-financed property \\
\hline
\end{tabular}

Schedule E Investment Income of an R\&TC Section 23701g, Section 23701i, or Section 23701n Organization
\begin{tabular}{|c|c|c|c|c|c|}
\hline 1 Description & 2 Amount & \(3 \begin{aligned} & \text { Deductions directly } \\ & \text { connected }\end{aligned}\) & 4 Net investment income, column 2 less column 3 & 5 Set-asides & \begin{tabular}{l}
6 \\
Balance of investment income, column 4 less column 5
\end{tabular} \\
\hline & & & & & \\
\hline & & & & & \\
\hline \multicolumn{6}{|l|}{Total. Enter here and on Side 2, Part I, line 8} \\
\hline Enter gross in & harge & & & & \\
\hline
\end{tabular}

\section*{Schedule F Interest, Annuities, Royalties and Rents from Controlled Organizations}


\section*{Schedule G Exploited Exempt Activity Income, other than Advertising Income}
\begin{tabular}{|c|c|c|c|c|c|c|c|}
\hline 1 Description of exploited activity (attach schedule if more than one unrelated activity is exploiting the same exempt activity) & 2 Gross unrelated business income from trade or business & 3 Expenses directly connected with production of unrelated business income & 4 Net income from unrelated trade or business, column 2 less column 3 & 5 Gross income from activity that is not unrelated business income & 6 Expenses attributable to column 5 & 7 Excess exempt expense, column 6 less column 5 but not more than column 4 & 8 Net income includible, column 4 less column 7 but not less than zero \\
\hline & & & & & & & \\
\hline & & & & & & & \\
\hline & & & & & & & \\
\hline & & & & & & & \\
\hline Total. Enter here and on Side 2, line 10 & & & & & & & \\
\hline
\end{tabular}

Schedule H Advertising Income and Excess Advertising Costs

\section*{Part I Income from Periodicals Reported on a Consolidated Basis}


Part III Column A - Net Advertising Income
\begin{tabular}{l|l|}
\hline \begin{tabular}{l} 
(a) Enter "consolidated periodical" and/or \\
names of non-consolidated periodicals
\end{tabular} & \begin{tabular}{c} 
(b) Enter total amount from Part I, \\
columns 4 or 7, and amount listed in \\
Part II, columns 4 or 7
\end{tabular} \\
\hline & \\
\hline & \\
\hline & \\
\hline Enter total here and on Side 2, Part I, line 11 & \\
\hline
\end{tabular}

Part III Column B - Excess Advertising Costs

Schedule I Compensation of Officers, Directors, and Trustees
\begin{tabular}{|c|c|c|c|c|c|}
\hline 1 Name of officer & 2 SSN or ITIN & 3 Title & 4 Percent of time devoted to business & 5 Compensation attributable to unrelated business & 6 Expense account allowances \\
\hline & & - & \% & & \\
\hline & & \(\square\) & \% & & \\
\hline & - & & \% & & \\
\hline & ) & & \% & & \\
\hline & & & \% & & \\
\hline Total. Enter here and on Side 2, Part II, line 14 & & & & & \\
\hline
\end{tabular}
, Enter here and on Side 2. Part II, line 14
\begin{tabular}{|l|l}
\begin{tabular}{c} 
(a) Enter "consolidated periodical" and/or \\
names of non-consolidated periodicals
\end{tabular} & \begin{tabular}{l} 
(b) Enter total amount from Part I, column 4, \\
and amounts listed in Part II, column 4
\end{tabular} \\
\hline & \\
& \\
\hline
\end{tabular}

Schedule J Depreciation (Corporations and Associations only. Trusts use form FTB 3885F.)

CA 109 NATURE OF TRADE OR BUSINESS STATEMENT 1

INVESTMENT IN PARTNERSHIPS

TO FORM 109, PAGE 1
\begin{tabular}{lr}
\hline \hline CA 109 & OTHER INCOME \\
\hline & STATEMENT 2 \\
DESCRIPTION & \\
\hline AG REALTY FUND VIII LP & AMOUNT \\
MONTAUK TRIGUARD FUND IV, LP & \(-9,520\). \\
MONTAUK TRIGUARD FUND V LP & \(-2,054\). \\
MONTAUK TRIGUARD FUND VI LP. & \(-1,186\). \\
NEW MOUNTAIN PARTNERS VI LP & \(-3,483\). \\
AG SF (L) L.P. & \(-1,106\). \\
VANCE STREET CAPITAL III LP & \(-6,229\). \\
TOTAL TO FORM 109, PAGE 2, LINE 12 & \(-23,663\).
\end{tabular}


\section*{Part II NOL carryover and disaster loss carryover limitations. See instructions.}

1 Net income - Enter the amount from Form 100, line 18; Form 100W, line 18; Form 100S, line 15 less line 16; or Form 109, line 2; (but not less than -0 -). If the corporation taxable income is \(\$ 1,000,000\) or more, see inst


\section*{Prior Year NOLs}

* Type of NOL: General (GEN), New Business (NB), Eligible Small Business (ESB), or Disaster (DIS).

\section*{Part III 2021 NOL deduction}



\footnotetext{
129291
\(01-17-22\)
}
CA RRF-1

EXPLANATION OF FINANCIAL TRANSACTIONS
PART LINE 1 \(\quad\) STATEMENT 3

THE FOUNDATION ENTERED INTO AN AGREEMENT WITH THE CHIEF ADMINISTRATIVE OFFICER TO PROVIDE ADMINISTRATIVE SERVICES AS AN INDEPENDENT CONTRACTOR DIRECTLY TO THE FOUNDATION FOR A FEE OF \(\$ 102,000\) PER YEAR. THE AGREED UPON FEE FOR THESE SERVICES HAS BEEN EVALUATED AND DETERMINED REASONABLE BY THE BOARD. THIS IS AN EXCEPTED ACT OF SELF-DEALING UNDER IRS SECTION 4941(D)(2)(E).```

